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| **Special Occupancy Technical Advisory Committee (TAC) – 6 Comments** |
| **8th. Edition (2023) Florida Building Code, Building**  **CHAPTER 4**  **SPECIAL DETAILED REQUIREMENTS BASED ON OCCUPANCY AND USE**  **1) SP-B-Ch. 4 Comment #1 (Page 3)**  **Skip Gregory**  **Comment on (SP10478 AM A3) and (SP10338 AM A1 - Withdraw)**  ACHA wants to retain the current language from the 7th. Edition  **TAC Recommendation: Recommend the Commission withdraw modifications SP10388 SP10478 and amend the 8th. Edition (2023) FBC Draft to retain the current Code language in Section 449.4.2.2.1 of the 7th. Edition (2021), Florida Building Code. Unanimous 6-0**  **Commission Action: As per the TAC’s recommendation – Unanimous** |
| **2) SP-B-Ch. 4 Comment #2 (Page 4)**  **Skip Gregory**  **Comment on (SP10498 AM A1) and (SP10362 AM A2)**  ACHA wants to retain the current language from the 7th. Edition  **TAC Recommendation: Recommend the Commission withdraw modifications SP10498 and SP10362 and amend the 8th. Edition (2023) FBC Draft to retain the current Code language in Section 450.4.2.2.1 of the 7th. Edition (2021), Florida Building Code. Unanimous 6-0**  **Commission Action: As per the TAC’s recommendation – Unanimous** |
| **CHAPTER 30 ELEVATORS AND CONVEYING SYSTEMS**  **3) SP-B-Ch. 30 Comment #1 [New Subject] (Page 6)**  **Savannah Clarkston -** National Elevator Industry Inc.  **Comment on Sect. 3009.2**  **Justin: This is a new subject area that did not go through the statutorily required review process and it conflicts with the existing Accessibility Code statutory language and can only be amended by the Florida Legislature.**  **The Accessibility TAC voted to recommend denial on the comment.**  **TAC Recommendation: Denial 6-0**  **Commission Action: No Action** |
| **CHAPTER 35 REFERENCED STANDARDS**  **4) SP-B-Ch. 35 Comment #1 (Page 7)**  **Skip Gregory**  **Withdraw Comment**  **Comment on (SP 10484)**  **Comment Withdrawn by Proponent**  **TAC Recommendation: No action needed proponent withdrew the comment.**  **Commission Action: No Action** |
| **Comments Received After the 01/31/23 Deadline**  **5) Storm Surge Requirements Hospitals and All Essential Facilities**  **Brian Bradley - Lee Memorial Health System**  **Proponent Withdrew Comment**  **6) Comment in support of Comment #5**  **Laura Stillman – National Healthcare Practice Leader, Flad Architects**  **Proponent Withdrew Comment**  **Comments on 449.4.2.2.1 – Hospitals and 450.4.2.2.1 – Nursing Homes**  **TAC Recommendation: No action needed proponents withdrew their comments.**  **Commission Action: No Action** |

**Special Occupancy Technical Advisory Committee (TAC) – 5 Comments**

**8th. Edition (2023) Florida Building Code, Building**

**CHAPTER 4**

**SPECIAL DETAILED REQUIREMENTS BASED ON OCCUPANCY AND USE**

**1) SP-B-Ch. 4 Comment #1**

**Comment on (SP10478 AM A3) and (SP10338 AM A1)**

**SP10338 AM A1**

Name James Gregory

Address 4128 Zermatt Dr

City Tallahassee

State FL

Zip Code 32303

Email gregoryskip@gmail.com

Primary Phone (850) 567-3303

I am the maker of SP10338. For editorial and clarity reasons only, this approved modification should be deleted in favor of SP10478 because it is redundant to SP10478 and will be confusing if it is allowed to be added to the Code.

SP10478, submitted by Scott Waltz, modifies section 449.2.2.1 and includes everything that SP 10338 provided in its modification of section 449.2.2.1. I have marked through SP10338 so it can be deleted and coordinated with SP10478

**449.4.2.2.1**

~~Except as permitted by Section 1612 of this code, the lowest floor of all new facilities shall be elevated to the base flood elevation as defined in Section 1612 of this code, plus 2 feet, or to the height of hurricane Category 3 (Saffir-Simpson scale) surge inundation elevation, as described by the Sea, Lake, and Overland Surge (SLOSH) from Hurricanes model developed by the Federal Emergency Management Agency (FEMA), United States Army Corps of Engineers (USACE), and the National Weather Service (NWS), whichever is higher.~~

The lowest finished floor of all construction of new facilities and additions, substantial improvements to, or restoration of substantial damage to existing facilities, and their support utilities shall be located at or above the highest of the following elevations:

1. Two feet above the base flood elevation as defined in this code.
2. The height of a hurricane Category 5 (Saffir-Simpson scale) surge inundation elevation, as described by the Sea, Lake, and Overland Surge (SLOSH) from Hurricanes model developed by the Federal Emergency Management Agency (FEMA), United States Army Corps of Engineers (USACE), and the National Weather Service (NWS)
3. The design flood elevation as defined in this code.
4. The 500-year flood elevation (elevation with a .02% chance of being equaled or exceeded in any given year) as described in ASCE 24.

**Exceptions:**

1. Fuel supply storage tanks located below ground and/or sufficiently ballasted or anchored to resist uplift due to buoyancy and designed to resist hydrostatic pressures exerted by a 500-year flood event or a category 5 hurricane storm surge inundation.
2. Additions that are not a substantial improvement to an existing facility that was designed and constructed in accordance with the Florida Building Code’s site standards for a hospital in effect at the time of construction shall be located at or above the finish floor elevation of the existing facility.
3. **~~449.4.2.2.2~~**

~~For all existing facilities, the lowest floor elevations of all additions, and all patient support areas including food service, and all patient support utilities, including mechanical, and electrical (except fuel storage as noted in Section 449.4.2.9.3 of this code) for the additions shall be at or above the elevation of the existing building, if the existing building was designed and constructed to comply with either the site standards of Section 449.4 of this code or local flood-resistant requirements, in effect at the time of construction, whichever requires the higher elevation, unless otherwise permitted by Section 1612 of this code. If the existing building was constructed prior to the adoption of either the site standards of Section 449.4 of this code or local flood-resistant requirements, then the addition and all patient support areas and utilities for the addition as described in this section shall either be designed and constructed to meet the requirements of Section 449.4.2.2.1 of this code or be designed and constructed to meet the dry flood proofing requirements of Section 1612 of this code.~~

**(SP10478 AM A3)**

449.4.2.2.1

~~Except as permitted by Section 1612 of this code, tThe lowest floor of all new facilities shall be elevated to not lower than the base flood elevation as defined in Section 1612 of this code, plus 2 feet, the 500 year flood elevation as defined in ASCE 24, or to the height of hurricane Category 35 (Saffir-Simpson scale) surge inundation elevation, as described by the Sea, Lake, and Overland Surge (SLOSH) from Hurricanes model developed by the Federal Emergency Management Agency (FEMA), United States Army Corps of Engineers (USACE), and the National Weather Service (NWS), whichever is higher.~~

**(SP10338 AM A1)**

**2) SP-B-Ch. 4 Comment #2**

**Comment on (SP10498 AM A1) and (SP10362 AM A2)**

Name James (Skip) Gregory

Address: 4128 Zermatt Dr

City: Tallahassee

State: FL

Zip Code: 32303

Email: gregoryskip@gmail.com

Primary Phone: (850) 567-3303

SP10362

I am the maker of SP10362. For editorial and clarity reasons only, this approved modification should be deleted in favor of modification SP10498 because it is redundant to SP10498 and will be confusing if it is allowed to be added to the Code.

SP10498, submitted by Scott Waltz, modifies section 449.2.2.1 and includes everything that SP 10362 provided in its modification of section 449.2.2.1. I have marked through SP10362 so it can be deleted and coordinated with SP10498.

**450.4.2.2.1**

~~Except as permitted by Section 1612 of this code, the lowest floor of all new facilities shall be elevated to the base flood elevation as defined in Section 1612 of this code, plus 2 feet, or to the height of hurricane Category 3 (Saffir-Simpson scale) surge inundation elevation, as described by the Sea, Lake, and Overland Surge (SLOSH) from Hurricanes model developed by the Federal Emergency Management Agency (FEMA), United States Army Corps of Engineers (USACE), and the National Weather Service (NWS), whichever is higher.~~

The lowest finished floor of all construction of new facilities and additions, substantial improvements to, or restoration of substantial damage to existing facilities, and their support utilities shall be located at or above the highest of the following elevations:

1. Two feet above the base flood elevation as defined in this code.
2. The height of a hurricane Category 5 (Saffir-Simpson scale) surge inundation elevation, as described by the Sea, Lake, and Overland Surge (SLOSH) from Hurricanes model developed by the Federal Emergency Management Agency (FEMA), United States Army Corps of Engineers (USACE), and the National Weather Service (NWS)
3. The design flood elevation as defined in this code.
4. The 500-year flood elevation (elevation with a .02% chance of being equaled or exceeded in any given year) as described in ASCE 24.

**Exceptions:**

1. Fuel supply storage tanks located below ground and/or sufficiently ballasted or anchored to resist uplift due to buoyancy and designed to resist hydrostatic pressures exerted by a 500-year flood event or a category 5 hurricane storm surge inundation.
2. Additions that are not a substantial improvement to an existing facility that was designed and constructed in accordance with the Florida Building Code’s site standards for a hospital in effect at the time of construction shall be located at or above the finish floor elevation of the existing facility.

**~~450.4.2.2.2~~**

~~For all existing facilities, the lowest floor elevations of all additions, and all patient support areas including food service, and all patient support utilities, including mechanical, and electrical (except fuel storage as noted in Section 450.4.2.9.3 of this code) for the additions shall be at or above the elevation of the existing building, if the existing building was designed and constructed to comply with either the site standards of Section 450.4 of this code or local flood-resistant requirements, in effect at the time of construction, whichever requires the higher elevation, unless otherwise permitted by Section 1612 of this code. If the existing building was constructed prior to the adoption of either the site standards of Section 450.4 of this code or local flood-resistant requirements, then the addition and all patient support areas and utilities for the addition as described in this section shall either be designed and constructed to meet the requirements of Section 450.4.2.2.1 of this code or be designed and constructed to meet the dry flood proofing requirements of Section 1612 of this code.~~

**(SP10498 AM A1)**

450.4.2.2.1

~~Except as permitted by Section 1612 of this code,~~ ~~tThe lowest floor of all new facilities shall be elevated to not lower than the base flood elevation as defined in Section 1612 of this code, plus 2 feet, the 500 year flood elevation as defined in ASCE 24, or to the height of hurricane Category 35 (Saffir-Simpson scale) surge inundation elevation, as described by the Sea, Lake, and Overland Surge (SLOSH) from Hurricanes model developed by the Federal Emergency Management Agency (FEMA), United States Army Corps of Engineers (USACE), and the National Weather Service (NWS), whichever is higher. Strengthens the code by requiring elevation to above the 500 year flood elevation and removes language that can be misinterpreted to apply these requirements only to facilities located in the flood hazard area as defined by section 1612.~~

**(SP10362 AM A2)**

**CHAPTER 30 ELEVATORS AND CONVEYING SYSTEMS**

**3) SP-B-Ch. 30 Comment #1 [New Subject]**

**From:** Savannah Clarkston [mailto:sclarkston@neii.org]   
**Sent:** Tuesday, January 31, 2023 8:58 AM  
**To:** Madani, Mo <Mo.Madani@myfloridalicense.com>  
**Subject:** Sect. 3009.2 FL Building Code Comments

Mr. Madani,

I appreciate your help this morning and quick response. Attached you will find a cover letter and comments on Sect. 3009.2 from Kevin Brinkman, our Senior Director of codes for National Elevator Industry Inc. (NEII).

Please let me know if I can provide any additional information.

Thank you,

Savannah Clarkston

NEII • Assistant Director, Government Affairs

[sclarkston@neii.org](mailto:sclarkston@neii.org)

(303) 862-2331 (cell)

2020 FBC, 3009.2  
  
Each elevator car interior must have a support rail on at least one wall. All support rails must be smooth and have no sharp edges and must not be more than 1 1/2 inches (38 mm) thick or 2 1/2 inches (63 mm) in diameter. At least one support ~~Support~~ rail~~s~~ must be continuous and a minimum length of 42 inches (1067 mm) overall.

The inside surface of support rails must be 1 1/2 inches (38 mm) clear of the car wall. The distance from the top of the support rail to the finished car floor must be at least 31 inches (787 mm) and not more than 33 inches (838 mm). Padded or tufted material or decorative materials such as wallpaper, vinyl, cloth or the like may ~~be~~ not be used on support rails.

Rationale: To allow additional support rails of shorter lengths to better accommodate passengers with mobility limitations. The current language does not allow additional rails that are shorter than 42 inches.

Editorial clean up

FL Department of Business and Professional Regulation, Florida Building Commission

Attn: Mo Madani

Email: [mo.madani@myfloridalicense.com](mailto:mo.madani@myfloridalicense.com)

Re: NEII comments on the Florida Building Code (Eighth Edition - 2023)

The National Elevator Industry, Inc., (NEII) is the leading trade association for companies that manufacture, install, and maintain elevators, escalators, moving walks, and other building transportation products. NEII members represent over eighty-five percent of the work hours in the building transportation industry. As such, we welcome the opportunity to comment on the State of Florida proposed adoption of the 2021 suite of International Code Council building codes.

NEII would like to request a revision to Section 3009.2 of the Florida Building Code per the attached document. This section requires a support rail on at least one wall with additional requirements for location and design of the support rail. One of those requirements is that all support rails must be a minimum of 42 inches long. As written, if additional rails beyond the one required are provided, they must also be 42 inches in length. There may be circumstances where additional support rails are desirable to better accommodate passengers with mobility limitations but size constraints would not allow these additional rails to be 42 inches long. Please consider the revision shown in the attachment which would allow additional rails that are shorter to better serve accessibility needs.

NEII appreciates the opportunity to submit comments as the Florida Building Commission considers updates to the building code. Please do not hesitate to contact NEII’s Senior Director of Codes, Kevin Brinkman at (309) 208-0812 o[r via e-mail at klbrinkman@neii.org](mailto:klbrinkman@neii.org) if you have any questions or need additional information.

Regards



**CHAPTER 35 REFERENCED STANDARDS**

**4) SP-B-Ch. 35 Comment #1**

Comment on SP 10484

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| |  | | --- | | SP10484 | | Name | James Gregory | | Address | 4128 Zermatt Dr, Tallahassee Fl 32302 | | Email | gregoryskip@gmail.com | | Primary Phone | (850) 567-3303 | | Alternate Phone | (850) 514-2495 |   I am the maker of SP10484. This exclusion was inadvertently omitted when the reference standards were updated. This section is excluded from adoption because it allows a subpar treatment area in the emergency room.  Text of Modification |
| FGI The Facility Guidelines Institute  9750 Fall Ridge Trail  St. Louis, MO 63127  Standard referenced number   Title  GHCF—~~18~~ 22 Guidelines for Design and Construction of Hospitals, excluding section 2.2-3.1.3.6 (6) Low-acuity patient treatment area  GHCF—~~18~~ 22 Guidelines for Design and Construction of Outpatient Facilities  GHCF—~~18~~22 Guidelines for Design and Construction of Residential Health, Care, and Support Facilities ~~(First Printing 2018)~~ |