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Florida Building Commission
C/o Rick Dixon
Florida Department of Community Affairs
2555 Shumard Oak Blvd.
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Petition for Declaratory Statement
From The Florida Building Commission

RE: Section 905.1, #2.
Florida Building Code 2004 ed.

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DCA07-DEC-159
FILING AND ACKNOWLEDGEMENT
FILED, on this date, with the designated
Clerk, receipt of which is hereby
acknowledged.
Paula P. Ford 8/15/07
Paula P. Ford
Commission Clerk Date

Mechanical
Electrical
Plumbing
Fire Protection

An interpretation is requested for Section 905.1 #2 of the 2004 Florida Building Code, as it pertains to four story townhomes.

905.1 states as follows:

- Standpipe systems shall be provided in all new building in which
1. The highest floor is greater than 30 feet above the lowest level of fire dept. vehicle access; or
 2. The highest floor is more than three stories above grade; or
 3. The lowest floor is more than one story below grade; or
 4. The lowest floor is more than 20 feet below grade.

Although the exception of 905.3 states

Exception: Standpipe systems are not required in Group R-3 occupancies as applicable in Section 101.2.

Section 101.2 of the FBC refers only to three story structures, thus not pertaining to four story townhomes.

We have conflicting opinions with the interpretation of this code given by the Department of Community Affairs. As explained by the following information:

- 1) The townhomes are separated by 4-hour fire-resistant-rated construction and

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have separate entrances.

2) The staircases inside Townhomes are not built inside a fire rated enclosure (or any enclosure for that matter), thus subjecting fire fighters to exposure to fire and smoke while making their hose connection.

3) Because Townhomes are fee simple and are not permitted to have any system pass through a neighboring townhome, each unit would be required to have its own separate standpipe and its own Fire Department Connection.

4) Often there are, as many as, six townhomes connected to each other (built together) each with their own separate staircase. This would result in six standpipes all within a linear space of 180' {based on 6(six) 30' wide townhomes}.

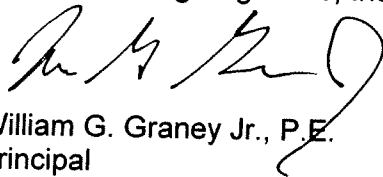
5) Is it the intent of the code to require a standpipe in a single family dwelling? The last paragraph of Section 905.3 FBC Commentary has an eloquent argument against it.

We are seeking an answer to the following question:

Is it the intent of section 905.1, #2 of the FBC to require the installation of standpipes inside four story townhome?

Sincerely,

KTD Consulting Engineers, Inc.



William G. Graney Jr., P.E.
Principal

Date: August 7, 2007

