**Fire Technical Advisory Committee (TAC)/Electrical TAC/Special Occupancy (TAC)– Comments**

**7th Edition (2020) Florida Building Code, Existing Building**

**Chapter 7 ALTERATIONS—LEVEL 1**

F- EB- Ch. 7 - Comment #1

**From:** Rodriguez, Gaspar (RER) [mailto:Gaspar.Rodriguez@miamidade.gov]   
**Sent:** Monday, August 19, 2019 9:21 AM  
**To:** Madani, Mo  
**Subject:** Proposed 2020 Code Change

Good morning Mo,

I’m writing you in regards to a 2018 ICC change which I believe was never reviewed by any TAC for recommendation in the 2020 FBC.

The 2018 ICC Existing Building included a change to Section 702.5 which corrected R310.21 to correctly indicate R310.2.1 and added R310.2.2.

I believe this change, which in fact it is really a correction, should be included in the 2020 FBC.

Is it possible to still get this correction reviewed to be included in the 2020 FBC?

Regards,

**Gaspar J Rodriguez,** Senior Code Officer, Roofing

**702.5 ~~Emergency~~Replacement window emergency escape and rescue openings.**

Where windows are required to provide emergency escape and rescue openings in Group R-2 and R-3 occupancies and one-and two-family dwellings and townhouses regulated by the Florida Building Code, Residential, replacement windows shall be exempt from the requirements of Sections 1030.2, 1030.3 and 1030.5 of the Florida Building Code, Building and Sections ~~R310.21~~R310.2.1, R310.2.2 and R310.2.3 of the Florida Building Code, Residential accordingly, provided the replacement window meets the following conditions:

1.The replacement window is the manufacturer's largest standard size window that will fit within the existing frame or existing rough opening. The replacement window shall be permitted to be of the same operating style as the existing window or a style that provides for an equal or greater window opening area than the existing window.

2. The replacement of the window is not part of a change of occupancy.

Window opening control devices complying with ASTM F 2090 shall be permitted for use on windows required to provide emergency escape and rescue openings.

(F8049) /(I-Code)

**TAC Recommendation: AS**

**Commission Action: AS**

**7th Edition (2020) Florida Building Code, Building**

**CHAPTER 6 TYPES OF CONSTRUCTION**

F-B-Ch.6 – Comment #1

**Bryan P. Holland, MCP, AStd.**

**Southern Region Field Representative**

**Delete Section 604**

**~~SECTION 604~~**

**~~604 Fuel line piping protection.~~** ~~Fuel lines supplying a generator set inside a building shall be separated from areas of the building other than the room the generator is located in by an approved method, or an assembly that has a fire-resistance rating of not less than 2 hours. Where the building is protected throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1, the required fire-resistance rating shall be reduced to 1 hour.~~

**REASON FOR COMMENT AND RECOMMENDED CHANGES:**

* This requirement was never intended to be added to Chapter 6 of the building code. F79-16 AMPC2 was attempting to add this requirement to Chapter 6 of the IFC and Chapter 27 of the IBC.
* This requirement is already located in the correct locations under Section 403.4.8.2 and 2702.1.8 of the FBC-B.

**TAC Recommendation: AS**

**Commission Action: AS**

**CHAPTER 9 FIRE PROTECTION SYSTEMS**

F-B-Ch.9 – Comment #1

**Bryan P. Holland, MCP, AStd.**

**Southern Region Field Representative**

**Add Section 907.2.13.3**

**[F] 907.2.13.3 Multiple-channel voice evacuation.** In buildings with an occupied floor more than 120 feet (36576 mm) above the lowest level of fire department vehicle access, voice evacuation systems for high-rise buildings shall be multiple-channel systems.

**REASON FOR COMMENT AND RECOMMENDED CHANGES:**

* A multi-channel system allows the emergency responders to deliver different live messages to various areas of the building at one time, which can lead to more detailed and more efficient emergency communications to the occupants.
* These same capabilities can serve occupant evacuation elevators and area of refuge emergency communication systems.

**TAC Recommendation: NAR**

**Commission Action: NAR**

F/E-B-Ch.9 – Comment #2

**Bryan P. Holland, MCP, AStd.**

**Southern Region Field Representative**

**Add Section 917**

**SECTION 917**

**MASS NOTIFICATION SYSTEMS**

**[F] 917.1 College and university campuses**. Prior to construction of a new building requiring a fire alarm system on a multiple-building college or university campus having a cumulative building occupant load of 1,000 or more, a mass notification risk analysis shall be conducted in accordance with NFPA 72. Where the risk analysis determines a need for mass notification, an approved mass notification system shall be provided in accordance with the findings of the risk analysis.

**REASON FOR COMMENT AND RECOMMENDED CHANGES:**

* The rule does not mandate the installation of a mass notification system but rather only requires an industry recognized risk assessment outlined in the NFPA 72. Only those campuses where it is shown that a mass notification system will enhance the evacuation, rescue, and other life-saving communications will be required to install one.
* There have been 250 active shooter incidents in the US between 2000-2017. Shootings on college campuses over the last five years have more than doubled since a similar period a decade earlier. In the 190 shooting incidents between the 2001 and 2016 school years, 437 people were shot, killing 167 and wounding an additional 270. And that is just active shooter incidents.
* Mass notification also provides critical life-saving information to campus occupants related to missing persons, approaching storms, hazardous material exposure, etc. The rule only applies to college and university campuses where the life-saving benefits of a mass notification system have been proven by case study.
* Mass notification can cover one way, two way, outside areas, in-building areas, and distributed recipient (cell phone, laptop) forms of communication.

**TAC/F Recommendation: NAR**

**TAC/E Recommendation**: **NAR**

**Commission Action: NAR**

**CHAPTER 10 MEANS OF EGRESS**

F-B-Ch.10 – Comment #1

**Bryan P. Holland, MCP, AStd.**

**Southern Region Field Representative**

**Revise Section 1010.1.9.7**

**1010.1.9.7 Delayed egress.** Delayed egress locking systems shall be permitted to be installed on doors serving ~~Group B, E, F, I, M, R, S and U~~ the following occupancies in buildings that are equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 or an approved automatic smoke or heat detection system installed in accordance with Section 907. ~~The locking system shall be installed and operated in accordance with all of the following:~~

~~Exceptions:~~

1. Group B, F, I, M, R, S, and U occupancies.
2. Group E classrooms with an occupant load of less than 50.

~~1.~~ ~~Delayed egress locking systems shall be permitted to be installed on doors serving Group E occupancies that have an occupant load of 10 or fewer and that are in buildings that are equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 or an approved automatic smoke or heat detection system installed in accordance with Section 907.~~

~~2.~~ **Exception:** Delayed egress locking systems shall be permitted to be installed on exit or exit access doors, other than the main exit or exit access door, that serve a courtroom in buildings that are equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1.

**REASON FOR COMMENT AND RECOMMENDED CHANGES:**

* This revision captures the intent of the approved modifications to this section that did not get captured accurately in the Draft FBC-B or Supplement.

**TAC Recommendation: NAR**

**Commission Action: NAR**

F-B-Ch.10 – Comment #2

**Bryan P. Holland, MCP, AStd.**

**Southern Region Field Representative**

**Revise Section 1023.5**

**1023.5 Penetrations.** Penetrations into or through interior exit stairways and ramps are prohibited except for the following: ~~equipment and ductwork necessary for independent ventilation or pressurization, sprinkler piping, standpipes, electrical raceway for fire department communication and security systems and electrical raceway serving the interior exit stairway and ramp and terminating at a steel box not exceeding 16 square inches (0.010 m2).~~

1. Equipment and ductwork necessary for independent ventilation or pressurization.

2. Fire protection systems.

3. Security systems.

4. Two-way communication systems.

5. Electrical raceway for fire department communication systems.

6. Electrical raceway serving the interior exit stairway and ramp and terminating at a steel box not exceeding 16 square inches (0.010 m2).

Such penetrations shall be protected in accordance with Section 714. There shall not be penetrations or communication openings, whether protected or not, between adjacent interior exit stairways and ramps.

**Exception:** Membrane penetrations shall be permitted on the outside of the interior exit stairway and ramp. Such penetrations shall be protected in accordance with Section 714.3.2.

**REASON FOR COMMENT AND RECOMMENDED CHANGES:**

* This is a purely editorial change to add clarity and conciseness to the code.

**TAC Recommendation: NAR**

**Commission Action: NAR**

F/SP-B-Ch.30 – Comment #1

**CHAPTER 30 ELEVATORS AND CONVEYING SYSTEMS**

**Proposed Modification to the Florida Building Code**

**Modification #: Section 553.73, Fla Stat**

**Name: Joseph D. Belcher**

**Representing: FHBA**

**Address: 41 Oak Village Blvd. Homosassa, FL 34446-5632**

**E-mail: Joe@jdbcodeservices.com**

**Phone: (352) 302-0825**

**Fax: (813) 925-4152**

**Code: FBC-B**

**Section #: 3006.2.1**

**Modification to the Florida Building Code.]:**

**~~3006.2.1 Rated corridors.~~** ~~Where corridors are required to be fire resistance rated in accordance with Section 1020.1, elevator hoistway openings shall be protected in accordance with Section 3006.3.~~

**(G201-15)**

**Rationale:** The provision has no impact in Florida and is likely to lead to misinterpretations. The provision has no effect because staturory provisions require fire sprinklers to be installed in buildings three stories or more in height. [Ch. 553.895(2) F.S.] The added section requires protection per FBC-B §3006.3. FBC-B §3006.3 in the first sentence says one of the means of protection listed is required if protection is required by FBC-B §3006.2. FBC-B §3006.2 applies to elevator hoistways that: 1. Connect more than three stories, 2. Are required to be enclosed in a shaft, and 3. Any of the listed conditions exists The first listed condition is the building is **not** protected by a fire sprinkler system. The "**and"**makes the more than three stories and a required shaft enclosure both applicable. The provision related to connecting more than three stories means FBC-B §3006.3 is not applicable in Florida as all buildings (with very limited exceptions) three stories or more in Florida are required to be protected by fire sprinklers.

**Fiscal Impact Statement [Provide documentation of the costs and benefits of the proposed modifications to the code for each of the following entities. Cost data should be accompanied by a list of assumptions and supporting documentation. Explain expected benefits.]:**

**A. Impact to local entity relative to enforcement of code:** No fiscal impact on local enforcement.

**B. Impact to building and property owners relative to cost of compliance with code:** building and property owners. If the section remains and is misinterpreted to apply to sprinklered buildings the cost increase would be considerable.

**C. Impact to industry relative to cost of compliance with code:** No fiscal impact to industry. If the section remains and is misinterpreted to apply to sprinklered buildings the cost increase would be considerable.

**D. Impact to small business:** No fiscal impact to small business. If the section remains and is misinterpreted to apply to sprinklered buildings the cost increase would be considerable.

**Please explain how the proposed modification meets the following requirements:**

1. **Has a reasonable and substantial connection with the health, safety, and welfare of the general public:** The proposal has a positive impact on the health, safety, and welfare of the general public by deleting a section which does not impact construction in Florida and which may lead to costly misinterpretations.

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1. **Strengthens or improves the code, and provides equivalent or better products, methods, or systems of construction:** The proposal strengthens and improves the code by deleting a section which does not impact construction in Florida and which may lead to costly misinterpretations.
2. **Does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities:** The change does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities.
3. **Does not degrade the effectiveness of the code:** The proposed change does not degrade the effectiveness of the code and improves the effectiveness of the code.

**TAC/F Recommendation: Amended to include FBC 1020.1 which also references section 3006.2.1 (AM).**

**TAC/SP Recommendation: NAR until Fire TAC reviewed.**

**Commission Action: AM**

**CHAPTER 35 REFERENCED STANDARDS**

F-B-Ch.35 – Comment #1

**From:** Dawson, Robby [mailto:JDawson@nfpa.org]   
**Sent:** Monday, November 25, 2019 11:32 AM  
**To:** Madani, Mo  
**Cc:** Sinco, Casia  
**Subject:** FL Building Code - Proposed Referenced Standards

Mo,

As the follow-up to our conversation last week, here is a memo that can be used as a public comment in support of adopting the referenced standards noted.

I will also put in the request to get you those copies this week.

I’ve copied Casia here as well so she is aware of the conversation for the fire code adoption process.

If either of you need anything more, please let me know.

RD

**James “Robby” Dawson, MBA, CFO**

Southeast Regional Director | **NFPA**

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[www.nfpa.org](http://www.nfpa.org/)

**National Fire Protection Association**

The leading information and knowledge resource on fire, electrical and related hazards.

(See attachment 2)

**TAC Recommendation: AS**

**Commission Action: AS**

**7th Edition (2020) Florida Building Code, Residential**

F-R-Appendix Q – Comment #1

**Proposed Modification to the Florida Building Code**

**Name: Brad Schiffer AIA, Appendix Q proponent**

**Brad @ TAXIS-usa.com**

**Brad Wiseman, Tiny Home Industry Association**

**Chairman@tinyhomeindustryassociation.ofg**

**Code: FBC-R**

**Section #: Appendix Q**

**Modification to the Florida Building Code – Residential, Appendix Q.**

**Appendix Q**

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| **APPENDIX Q  TINY HOUSES**  **SECTION AQ101 GENERAL**  **AQ101.1** Scope. This appendix shall be applicable to tiny houses used as single dwelling units. Tiny houses shall com-ply with this code except as otherwise stated in this appendix.  **SECTION AQ102 DEFINITIONS**  **AQ102.1** **General.** The following words and terms shall, for the purposes of this appendix, have the meanings shown herein. Refer to Chapter 2 of this code for general definitions.  **EGRESS ROOF ACCESS WINDOW.** A skylight or roof window designed and installed to satisfy the emergency escape and rescue opening requirements of Section R310.2.  **LANDING PLATFORM.** A landing provided as the top step of a stairway accessing a loft.  **LOFT.** A floor level located more than 30 inches (762 mm) above the main floor, open to the main floor on one or more sides with a ceiling height of less than 6 feet 8 inches (2032mm) and used as a living or sleeping space.  **TINY HOUSE.** A dwelling that is 400 square feet (37 m2) or less in floor area excluding lofts.  **SECTION AQ103 CEILING HEIGHT**  **AQ103.1 Minimum ceiling height**. Habitable space and hallways in tiny houses shall have a ceiling height of not less than 6 feet 8 inches (2032 mm). Bathrooms, toilet rooms and kitchens shall have a ceiling height of not less than 6 feet 4 inches (1930 mm). Obstructions including, but not limited to, beams, girders, ducts and lighting, shall not extend below these minimum ceiling heights.  **Exception:** Ceiling heights in lofts are permitted to be less than 6 feet 8 inches (2032 mm).  **SECTION AQ104 LOFTS**  **AQ104.1** Minimum loft area and dimensions. Lofts used as a sleeping or living space shall meet the minimum area and dimension requirements of Sections AQ104.1.1 through AQ104.1.3.  **AQ104.1.1 Minimum area.** Lofts shall have a floor area of not less than 35 square feet (3.25 m2).  **AQ104.1.2 Minimum horizontal dimensions**. Lofts shall be not less than 5 feet (1524 mm) in any horizontal dimension.  **AQ104.1.3** Height effect on loft area. Portions of a loft with a sloped ceiling measuring less than 3 feet (914 mm) from the finished floor to the finished ceiling shall not be considered as contributing to the minimum required area for the loft. See Figure AQ104.1.3.  **Exception**: Under gable roofs with a minimum slope of 6 units vertical in 12 units horizontal (50-percent slope), portions of a loft with a sloped ceiling measuring less than 16 inches (406 mm) from the finished floor to the finished ceiling shall not be considered as contributing to the minimum required area for the loft.    **AQ104.2 Loft access and egress.** The access to and primary egress from lofts shall be of any type described in Sections AQ104.2.1 through AQ104.2.4. The loft access and egress element along its required minimum width, shall meet the loft where its ceiling height is not less than 3 feet (914 mm).  **AQ104.2.1 Stairways.** Stairways accessing lofts shall comply with this code or with Sections AQ104.2.1.1 through ~~AQ104.2.1.5.~~ AQ104.2.1.7.  **AQ104.2.1.1 Width.** Stairways accessing a loft shall not be less than 17 inches (432 mm) in clear width at or above the handrail. The width below the handrail shall be not less than 20 inches (508 mm).  **AQ104.2.1.2 Headroom.** The headroom ~~in~~ above stairways accessing a loft shall be not less than 6 feet 2 inches (1880 mm), as measured vertically, from a sloped line connecting the tread, landing or landing platform nosings in the ~~middle~~ center of their ~~width.~~ width, and vertically from the landing platform along the center of its width.  **AQ104.2.1.3 Treads and risers.** Risers for stairs accessing a loft shall be not less than 7 inches (178 mm) and not more than 12 inches (305 mm) in height. Tread depth and riser height shall be calculated in accordance with one of the following formulas:   1. The tread depth shall be 20 inches (508 mm) minus four-thirds of the riser height. 2. The riser height shall be 15 inches (381 mm) minus three-fourths of the tread depth.   **AQ104.2.1.4 Landings.** Intermediate landings and landings at the bottom of stairways shall comply with Section R311.7.6, except that the depth in the direction of travel shall be not less than 24 inches (610 mm).  **~~AQ104.2.1.4~~AQ104.2.1.5 Landing platforms.** The top tread and riser of stairways accessing lofts shall be constructed as a landing platform where the loft ceiling height is less than 6 feet 2 inches (1880 mm) where the stairway meets the loft. The landing platform shall be ~~18 inches to 22 inches (457 to 559~~ not less than 201 inches (508 mm) in width and in depth measured horizontally from and perpendicular to the nosing of the landing platform. The landing platform riser height to ~~the edge of~~ the loft~~, and 16 to~~ floor shall be not less than 16 inches (406 mm) and not greater than 18 inches (~~406 to~~ 457 mm) ~~in height measured from the landing platform to the loft floor~~.  **~~AQ104.2.1.5~~ AQ104.2.1.6 Handrails.** Handrails shall comply with Section R311.7.8.  **~~AQ104.2.1.6~~ AQ104.2.1.7 Stairway guards**. Guards at open sides of stairways, landings and landing platforms shall comply with Section R312.1.  **AQ104.2.2 Ladders.** Ladders accessing lofts shall comply with Sections AQ104.2.1 and AQ104.2.2.  **AQ104.2.2.1 Size and capacity.** Ladders accessing lofts shall have a rung width of not less than 12 inches (305 mm), and 10-inch (254 mm) to 14-inch (356 mm) spacing between rungs. Ladders shall be capable of supporting a ~~200~~ 300-pound (~~75~~ 136 kg) load on any rung. Rung spacing shall be uniform within 3/8 inch (9.5 mm).  **AQ104.2.2.2 Incline.** Ladders shall be installed at 70 to 80 degrees from horizontal.  **AQ104.2.3 Alternating tread devices**. Alternating tread devices accessing lofts shall comply with Sections R311.7.11.1 and R311.7.11.2. The clear width at and below the handrails shall be not less than 20 inches (508mm).  **AQ104.2.4 Ships ladders**. Ships ladders accessing lofts shall comply with Sections R311.7.12.1 and R311.7.12.2. The clear width at and below handrails shall be not less than 20 inches (508 mm).  **AQ104.2.5 Loft Guards.***Loft guards* shall be located along the open side(s) of *lofts*. Loft guards shall be not less than 36 inches (914 mm) in height or one-half of the clear height to the ceiling, whichever is less. Loft guards shall comply with Section R312.1.3 and Table R301.5 for their components.  **SECTION AQ105 EMERGENCY ESCAPE AND RESCUE OPENINGS**  **AQ105.1 General.** Tiny houses shall meet the requirements of Section R310 for emergency escape and rescue openings.  **Exception:** Egress roof access windows in lofts used as sleeping rooms shall be deemed to meet the requirements of Section R310 where installed such that the bottom of the opening is not more than 44 inches (1118 mm) above the loft floor, provided the egress roof access window complies with the minimum opening area requirements of Section R310.2.1. |

**Reason**: 1

This proposal improves Appendix Q by 1) modifying the language in some sections to provide clarity,2) adding Figure AQ104.1.3 from the Commentary to illustrate the meaning of "height effect, and 3) making other changes to the following sections: AQ104.2: The added sentence requires the ceiling height of the loft to be a minimum of 3 feet where access and egress element meets the loft. This was previously unaddressed .AQ104.2.1.2: The change at the end clarifies that the required ceiling height above a landing platform is measured from the landing platform itself, as opposed to a sloping line connecting the landing platform nosing and the loft nosing. This is because a person goes from a standing to a kneeling position when entering a loft from a landing platform. AQ104.2.1.4: A new section on intermediate and bottom landings for stairways sets their minimum dimensions, which was previously unaddressed. The 24” dimension in the direction of travel is greater than that required fora landing platform (20”) because the nature of their use differs. A person goes from standing to kneeling at a landing platform to a loft (or vice versa), whereas a short, standing stride may be needed at an intermediate or bottom landing. The 24” dimension provides for that.AQ104.2.5: The added sentence refers to related sections in the IRC to clarify that loft guard components must comply with those sections.

**Cost Impact:** The code change proposal will not increase or decrease the cost of construction. The proposed changes clarify dimensional requirements and language and do not affect cost.

**Reason:** 2

The proposed 300 pound ladder capacity coordinates with IMC Section 306.5. According to the Centers for Disease Control, the average American male over 30 years of age is 180 pounds. The margin of safety at 200 pounds capacity is inadequate to protect the public.

**Cost Impact:** The code change proposal will increase the cost of construction.

The code change proposal MAY increase the cost of construction.

Fiscal Impact Statement [Provide documentation of the costs and benefits of the proposed modifications to the code for each of the following entities. Cost data should be accompanied by a list of assumptions and supporting documentation. Explain expected benefits.]:

A. Impact to local entity relative to enforcement of code: No fiscal impact on local enforcement.

B. Impact to building and property owners relative to cost of compliance with code: No impact to owners.

C. Impact to industry relative to cost of compliance with code: No fiscal impact to industry.

D. Impact to small business: No fiscal impact to small business.

Please explain how the proposed modification meets the following requirements:

1. Has a reasonable and substantial connection with the health, safety, and welfare of the general public:

The proposal has a positive impact on the health, safety, and welfare of the general public.

1. Strengthens or improves the code, and provides equivalent or better products, methods, or systems of construction:

The proposal strengthens and improves the Code.

1. Does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities:

The change does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities.

1. Does not degrade the effectiveness of the code:

The proposed change does not degrade the effectiveness of the code and improves the effectiveness of the code.

**TAC Recommendation: AS**

**Commission Action: AS**

F-General – Comment #1

**From:** Neil Burning [mailto:nburning@ICCSafe.ORG]   
**Sent:** Thursday, January 02, 2020 1:50 PM  
**To:** Madani, Mo  
**Cc:** Campbell, Thomas  
**Subject:** Floridians for Safe Communities Coalition Comments regarding Draft 7th Edition of Florida Building Code

Mo,

I have attached our coalition’s comments regarding the draft 7th edition of the Florida Building Code.

Thank you,

**Neil Burning, CBO**

Vice President, Technical Resources

Government Relations (Florida)

International Code Council

(See attachment 1)

**TAC Recommendation: NAR**

**Commission Action: NAR**