

## Special Occupancy Technical Advisory Committee (TAC) – Comments

### 9th Edition (2026) Florida Building Code, Building/Residential/Mechanical/Existing

#### Editorial

#### SP Chs. 16/31 B- 3/31/46 R 5 Existing 3 M Comment #1

**From:** Rebecca Quinn <Rebecca@RCQuinnConsulting.com>

**Sent:** Monday, December 29, 2025 7:36 AM

**To:** Madani, Mo <Mo.Madani@myfloridalicense.com>

**Cc:** Jillian Kraynak (Jillian.Kraynak@em.myflorida.com) <jillian.kraynak@em.myflorida.com>; Michael Burchette <Michael.Burchette@em.myflorida.com>; Sean White <sean.white@em.myflorida.com>

**Subject:** FDEM comments on the draft 9th Edition (2026) update to the FBC

Mo,

I have reviewed the flood provisions in attached documents that show the proposed changes to the 8<sup>th</sup> Edition approved to produce the 9<sup>th</sup> Edition. The table below summarizes the comments, which are flagged in each attached file.

Code	Proposal #	Notes
BUILDING	SP12034	Add numbers to the two-item list
	SP11980	Shown twice. Retain the first instance; the second instance incorrectly shows our proposed added language that was disapproved.
	SP11976	Section shown twice; does not correctly show existing text stricken; code change number not identified
RESIDENTIAL	SP11984 and SP12018	Recommend show both changes in one instance.

	SP11629	Add a space
EXISTING BUILDING	SP12018	Correct cross reference
MECHANICAL	SP12019	Missing some underlining of new text
REFERENCE STANDARDS – BUILDING	SP12023	Reference to FEMA TB-11 was stricken.
	SP12034	The original proposal didn't show adding TAS 204 to Reference Standard (check SP12040 for the title). Our A1 also didn't show adding it; I brought to your attention during a phone call.
REFERENCE STANDARDS - RESIDENTIAL	FEMA	FEMA TB-2: the current effective date is 2025; it is incorrectly shown as “23” (there was no edition with that date).
	SP12023	FEMA TB-11 is correctly shown to be stricken, but “23” should be removed from the date. This TB has not been updated since 2001.

Rebecca C. Quinn, CFM

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**Supplement to the 8<sup>th</sup> Edition (2023) Florida Building Code, Building.**

**Commented [RQ1]:** Couple of notes

**1612.4.3 Testing of Dry Floodproofing Measures.** Where dry floodproofing is permitted by this code, materials, products and assemblies specified by registered design professionals as part of dry floodproofing measures shall meet the following, as applicable:

**Commented [RQ2]:** The item numbers got cut off in my revision

1. Where human intervention is not required (passive), meet the test requirements of ANSI/FM 2510, TAS 204 or an approved test standard, unless otherwise approved by the building official.

1. Where human intervention is required (active), meet the test requirements of ANSI/FM 2510 or an approved test standard, unless otherwise approved by the building official.

(Step 2 – SP12034 AM/A2 – 2<sup>nd</sup> comment period)

**1612.4.3 Testing of Dry Floodproofing Measures.** Where dry floodproofing is permitted by this code, materials, products and assemblies specified by registered design professionals as part of dry floodproofing measures shall meet the following, as applicable:

1. Where human intervention is not required (passive), meet the test requirements of ANSI/FM 2510, TAS 204 or an approved test standard, unless otherwise approved by the building official.

1. Where human intervention is required (active), meet the test requirements of ANSI/FM 2510 or an approved test standard, unless otherwise approved by the building official.

(Step 2 – SP12034 AM/A2 – 2<sup>nd</sup> comment period)

**3103.5.1.3 Flood loads.** ~~Public occupancy temporary structures need not be designed for flood loads specified in Section 1612. Controlled occupancy procedures in accordance with Section 3103.8 shall be implemented.~~ Temporary structures located in flood hazard areas shall conform with the wet floodproofing requirements of ASCE 24 for structures assigned Flood Design Class 1 as modified by the following:

1. Design for wind loads ~~in accordance with Sec. 3103.5.1.2~~ shall be permitted in lieu of design for flood loads in ASCE 7.
2. Temporary structures with rigid walls shall have flood openings in those walls.
3. Mechanical equipment and electric service shall be elevated to or above the base flood elevation. Controlled occupancy procedures in accordance with Section 3103.6 shall be implemented for public-occupancy temporary structure.

Should note this is SP11976 A1 2<sup>nd</sup> comment – and then remove the above phrase shown red/strike-thru to show the final approved text

Commented [RQ3]: The item numbers got cut off in my revision

## Supplement to the 8th Edition (2023) Florida Building Code, Residential

**Commented [RQ4]:** RQ two notes/comments: R322.1.6 and P3101.5

### **R322.1.6 Protection of mechanical, plumbing and electrical systems.**

**Commented [RQ5]:** Why isn't this change combined with the next one for the same section? a

Electrical systems, equipment and components; heating, ventilating, air conditioning; plumbing appliances and plumbing fixtures; duct systems; and other service equipment shall be located at or above the elevation required in Section R322.2 or R322.3. Replacement of exterior equipment and exterior appliances damaged by flood shall meet the requirements of this section. If replaced as part of a substantial improvement, electrical systems, equipment and components; heating, ventilating, air conditioning and plumbing appliances and plumbing fixtures; duct systems; and other service equipment shall meet the requirements of this section. Systems, fixtures, and equipment and components shall not be mounted on or penetrate through walls intended to break away under flood loads.

**Exception:** Locating electrical systems, equipment and components; heating, ventilating, air conditioning; plumbing appliances and plumbing fixtures; duct systems; and other service equipment is permitted below the elevation required in Section R322.2 or R322.3 provided that they are designed and installed to prevent water from entering or accumulating within the components and to resist hydrostatic and hydrodynamic loads and stresses, including the effects of buoyancy, during the occurrence of flooding to the required elevation in accordance with ASCE 24. Equipment for pools, spas and water features shall be permitted below the elevation required in Section R322.2 or R322.3 provided it ~~is elevated to the extent practical,~~ is anchored to prevent flotation and resist flood forces, and is supplied by branch circuits that have ground-fault circuit-interrupter protection. Electrical wiring systems are permitted to be located below

the required elevation provided that they conform to the provisions of the electrical part of this code for wet locations.

**(Step 2 – SP11984 AS/ 2<sup>nd</sup> comment period)**

**R322.1.6 Protection of mechanical, plumbing and electrical systems.** Electrical systems, equipment and components; heating, ventilating, air conditioning; plumbing appliances and plumbing fixtures; duct systems; and other service equipment shall be located at or above the elevation required in Section R322.2 or R322.3. ~~Replacement of exterior equipment and exterior appliances damaged by flood shall meet the requirements of this section.~~ If replaced as part of a substantial improvement, electrical systems, equipment and components; heating, ventilating, air conditioning and plumbing appliances and plumbing fixtures; duct systems; and other service equipment shall meet the requirements of this section. Systems, fixtures, and equipment and components shall not be mounted on or penetrate through walls intended to break away under flood loads.

**Exceptions:**

1. Unless part of substantial improvement or repair of substantial damage, replacement of exterior equipment and exterior appliances that are damaged by flood shall be elevated to or above the same height above grade as the first floor of the building, or 4 ft above grade, whichever is higher.

2. Locating electrical systems, equipment and components; heating, ventilating, air conditioning; plumbing appliances and plumbing fixtures; duct systems; and other service equipment is permitted below the elevation required in Section R322.2 or R322.3 provided that they are designed and installed to prevent water from entering or accumulating within the components and to resist hydrostatic and hydrodynamic loads and stresses, including the effects of buoyancy, during the occurrence of flooding to the required elevation in accordance with ASCE 24. Equipment for pools, spas and water features shall be permitted below the elevation required in Section R322.2 or R322.3 provided it is elevated to the extent practical and is anchored to prevent floatation and resist flood forces and is supplied by branch circuits that have ground-fault circuit interrupter protection. Electrical wiring systems are permitted to be located below the required elevation provided that they conform to the provisions of the electrical part of this code for wet locations.

**(Step 2 – SP12018 AM/ A2 - 2<sup>nd</sup> comment period)**

**Chapter 31 Vents**

**P3101.5 Flood resistance.** In flood hazard areas as established by Table R301.2, vents shall be located at or above the elevation required in Section R322.4 R322.2 (flood hazard areas including A Zones) or ~~R322.2~~ R322.3 (coastal

high-hazard areas including ~~V~~ V Zones and Coastal A Zones, where designated).

Commented [RQ6]: Add space

## CHAPTER 46

Commented [RQ7]: Two notes

### REFERENCED STANDARDS

FEMA TB-2—~~0823~~ Flood Damage-resistant Materials Requirements  
R322.1.8

Commented [RQ8]: Most recent edition of this is dated 2025. There has never been an edition dated 2023. 2024 IRC references the 2008 edition.

~~FEMA TB-11—0123~~ Crawlspace Construction for Buildings Located in Special Flood  
Hazard Area ~~R408.7~~

Commented [RQ9]: Stricken by SP12023. Remove this "23" – this TB has not been updated since 2001

Supplement to the 8<sup>th</sup> Edition (2023) FBC, Existing Building.

Commented [RQ10]: One note

#### [BS] 503.2 Flood hazard areas.

For buildings and structures in *flood hazard areas*, ~~established in Section 1612.3 of the Florida Building Code, Building, or Section R322 of the Florida Building Code, Residential, as applicable, any~~

1. Alterations ~~alteration~~ that constitutes *substantial improvement* of the existing structure shall comply with the flood design requirements for new construction, and all aspects of the existing structure shall be brought into compliance with the requirements for new construction for flood design.

2. Alterations ~~For buildings and structures in flood hazard areas established in Section 1612.3 of the Florida Building Code, Building, or Section R322 of the Florida Building Code, Residential, as applicable, any alterations~~ that do not constitute *substantial improvement* of the existing structure are not required to comply with the flood design requirements for new construction.

3. Unless part of substantial improvement or repair of substantial damage, replacement of exterior equipment and exterior appliances that are damaged by flood shall meet one of the following:

3.1. Be elevated to or above the same height above grade as the first floor of the building, or 4 ft above grade, whichever is higher.

3.2. For nonresidential buildings and nonresidential portions of buildings, be elevated in accordance with 3.1 or located in an enclosure that is dry floodproofed to 4 ft above grade, or the same height above grade as the first floor of the building, whichever is higher, in accordance with the dry floodproofing requirements of ASCE 24 for attendant utilities and equipment.

Commented [RQ11]: Should be "3.1" – the A1 revision incorrectly numbered the subitems 2.1 and 2.2 - you corrected that, but not this pointer

(Step 2 – SP12018AM/A2 – 2<sup>nd</sup> comment period)

**Supplement to the 8<sup>th</sup> Edition (2023) FBC, Mechanical**

Commented [RQ12]: ONE NOTE

**301.16 Flood hazard.** For structures located in flood hazard areas, mechanical systems, *equipment* and *appliances* shall be located at or above the elevation required by Section 1612 of the *International Building Code* for utilities and attendant *equipment*.

**Exceptions:**

Commented [RQ13]: Missing underlining (the highlighted)

**1.** Unless part of substantial improvement, replacement of exterior equipment and exterior appliances that are damaged by flood shall meet one of the following:

1.1. Be elevated to or above the same height above grade as the first floor of the building, or 4 ft above grade, whichever is higher.

1.2. For nonresidential buildings and nonresidential portions of buildings, be elevated in accordance with 1.1 or located in an enclosure that is dry floodproofed to 4 ft above grade, or the same height above grade as the first floor of the building, whichever is higher, in accordance with the dry floodproofing requirements of ASCE 24 for attendant utilities and equipment.

2. Mechanical systems, *equipment* and *appliances* are permitted to be located below the elevation required by Section 1612 of the *International Building Code* for utilities and attendant equipment provided that they are designed and installed to prevent water from entering or accumulating within the components and to resist hydrostatic and hydrodynamic loads and stresses, including the effects of buoyancy, during the occurrence of flooding up to such elevation.

(Step 2 – SP12019 AM/A1 – 2<sup>nd</sup> comment period)

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**TAC Recommendation:**

**Commission Action:**

**Editorial**

**SP Ch 4 B Comment #2**

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**From:** Skip Gregory <[gregoryskip@gmail.com](mailto:gregoryskip@gmail.com)>  
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**Subject:** Comments on the FBC


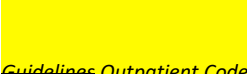
Mo, I know I had to get this to you by 1/30/26 and it is 10:30 PM now so it is still legally 1/30/26. Truth is, I forgot to send this to you earlier in the day.

There are only two items I found that really do need to be fixed and both are editorial.

Here they are:

**1. It is no longer titled the Guidelines but is now referenced in outpatient facilities as The Outpatient Code. See 452.2.2 of the revisions.**

Revise Section 451.3.16 to read as follows:

 **451.3.16** As required by  Outpatient Code, a waste anesthetic gas disposal (WAGD) system, in accordance with NFPA 99, Health Care Facilities Code, shall be provided in operating rooms where nitrous oxide and/or inhalation ~~anesthesia~~ anesthesia gas is intended to be administered.

**SP-FBC-B – Ch.4 – Errata #1**

**TAC Recommendation:**

**Commission Action:**