TAC: Code Administration

This document created by the Florida Department of Business and Professional Regulation -

850-487-1824

TAC: Code Administration

Total Mods for **Code Administration** in **Denied : 7**

Total Mods for report: 7

Sub Code: Building

1

CA11908

Date Submitted	02/04/2025	**Section**	107.1	**Proponent**	Jack Butler
Chapter	1	**Affects HVHZ**	No	**Attachments**	No
TAC Recommendation	Denied				
Commission Action	Pending Review				

Comments

General Comments No **Alternate Language Yes**

Related Modifications

107.3.1 (revised), 202 (new)

Summary of Modification

Add ability to provide digital construction documents when approved by the building official, clarify terms, and provide a means for accommodating digital documents in the approval process.

Rationale

The first proposed modification allows digital construction documents to be supplied where that is a form acceptable to the authority having jurisdiction. Adding that option to the permit application process brings the code up to date by recognizing a practice that it is already being applied. Section 107.2 explicitly allows “electronic media documents,” so the proposed modification makes the two sections consistent. The second proposed modification reflects the need to recognize the intent of the original term "additional construction documents," which is to demonstrate how the proposed design addresses the special conditions, by replacing "additional" with "supplemental," adding the reason for requesting the supplemental documents, and clarifying who may prepare such documents. The proposed deletion of "registered design professional" recognizes that state professional practice laws determine who may or must prepare these additional construction documents depending on their nature. However, the requirement for a registered design professional to prepare any supplemental document is preserved. Putting that requirement at the end of the paragraph allows it to apply to both regular and supplemental construction documents. The revised wording in the Exception clause is intended to recognize that it is the nature of the proposed work, and not the person who might prepare an unnecessary construction document, that should determine whether a specific construction document is not necessary for the contemplated project. For example, an interior modification may not need an exterior elevation, which, under the laws of the jurisdiction, might be prepared by anyone. A building official should be able to avoid the submission and subsequent review of any unnecessary construction documents in accordance with the nature of the proposed work.

Fiscal Impact Statement

Impact to local entity relative to enforcement of code

Local governments will experience reduced cost of storing and handling paper documents.

Impact to building and property owners relative to cost of compliance with code
Allowing digital construction documents will save an average of $112.50 per permit application (average of 25 18"x24" plan sheets times two sets at $2.25 per sheet printing cost).

Impact to industry relative to the cost of compliance with code
Industry will receive reduced cost of plan production and submission, in addition to getting approval or plan review notifications sooner.

Impact to small business relative to the cost of compliance with code
Small businesses will experience reduced costs for material, shipping, and labor.

Requirements

Has a reasonable and substantial connection with the health, safety, and welfare of the general public
Digital documents are more readily distributed and made available for use.

Strengthens or improves the code, and provides equivalent or better products, methods, or systems of construction
Provides the ability for local governments to accept digital documents in their original form and ensure preparation by the indicated persons through digital signature verification.

Does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities
Proposed modification removes current discrimination against digital construction documents.

Does not degrade the effectiveness of the code
Digital documents are equally effective in demonstrating code compliance.

Alternate Language

2nd Comment Period

CA11908-A1

Proponent Jack Butler **Submitted** 8/17/2025 1:36:10 PM **Attachments** No

Rationale:

The first modification is to allow digital construction documents when permitted or required by the building official. Digital construction documents are an increasingly preferred method of submission that facilitates the plan review and permitting process, in addition to reducing document storage requirements at local agencies. The building code needs to be modified to recognize this existing practice. The second modification recognizes that some additional construction documents may not be prepared by registered design professionals, such as manufacturer's installation instructions or a material test report. The terms 'special conditions' and 'additional construction documents' are shown in italics to show this proposed modification is connected to the new definitions proposed in CA11911.

Fiscal Impact Statement

Impact to local entity relative to enforcement of code

Allowing building officials to require or accept digital construction documents will facilitate plan review and inspection process, in addition to reducing the need to store voluminous paper copies. The other proposed modifications are editorial in nature.

Impact to building and property owners relative to cost of compliance with code

Where the building official allows digital construction documents to be submitted, building and property owners will avoid the cost of generating paper prints or copies of potentially large or numerous construction documents. The other proposed modifications are editorial in nature.

Impact to industry relative to the cost of compliance with code

The impact should be to reduce cost with the acceptance of digital construction documents. The other proposed modifications are editorial in nature.

Impact to small business relative to the cost of compliance with code

Small businesses will experience reduced costs for material, shipping, and labor.

Requirements

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

Support for digital documents will facilitate public access to building permit information.

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

Digital construction documents are routinely used in numerous construction-related activities, such as in seeking price proposals from subcontractors or securing manufacturer's installation instructions, which are usually downloaded from a website in a digital form.

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

The proposed modifications have no impact on actual construction materials or methods.

Does not degrade the effectiveness of the code

The use of digital documents and the clarification of defined terms will increase code effectiveness by recognizing common communication methods and distinguishing when special conditions require the submission of additional construction documents.

CA11908-A1Text Modification

107.1 General.

Submittal documents consisting of construction documents, statement of special inspections, geotechnical report and other data shall be submitted in two or more sets with each permit application. The building official may alternatively or additionally require construction documents to be submitted in digital form. The construction documents shall be prepared by a registered design professional where required by Chapter 471, Florida Statutes or Chapter 481, Florida Statutes. Where *special conditions* exist, the building official is authorized to require *additional construction documents* to be provided ~~prepared by a registered design professional~~.

Exception: The building official is authorized to waive the submission of construction documents and other data not required to be prepared by a registered design professional if it is found that the nature of the work applied for is such that review of construction documents is not necessary to obtain compliance with this code.

[The use of italics for 'special conditions' and 'supplemental construction documents' are intended to show this proposed modification is connected to the new definitions proposed in CA11911 and repeated here for clarity.]

SECTION 202

DEFINITIONS

ADDITIONAL CONSTRUCTION DOCUMENTS. A supplemental construction document not normally provided as part of the standard permit application package for the type of work proposed and that addresses one or more special conditions presented by the project.

SPECIAL CONDITIONS. Element of the construction site and/or design that is outside the parameters upon which the code is based or exceeds the prescriptive guidance found in the code and is unique to the project rather than generally applicable within the project area.

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CA11908Text Modification

[A] 107.1 General.

Submittal documents consisting of *construction documents*, statement of *special inspections*, geotechnical report and other data shall be submitted in two or more sets, or in digital format when allowed by the *building official*, with each *permit* application. ~~The construction documents shall be prepared by a *registered design professional* where required by Chapter 471, Florida Statutes or Chapter 481, Florida Statutes.~~ Where *special conditions* exist, the *building official* is authorized to require ~~additional~~ *supplemental construction documents* to be provided ~~prepared by a *registered design professional*~~. ~~The construction~~ *Construction documents* shall be prepared by a *registered design professional* where required by Chapter 471, *Florida Statutes* or Chapter 481, *Florida Statutes*.

Exception: The *building official* is authorized to waive the submission of *construction documents* and other data ~~not required to be prepared by a *registered design professional*~~ if it is found that the nature of the work applied for is such that review of the waived *construction documents* is not necessary to obtain compliance with this code.

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TAC: Code Administration

Total Mods for **Code Administration** in **Denied : 7**

Total Mods for report: 7

Sub Code: Building

2

CA11911

Date Submitted	02/04/2025	**Section**	107.3.4	**Proponent**	Jack Butler
Chapter	1	**Affects HVHZ**	No	**Attachments**	**Yes**
TAC Recommendation	Denied				
Commission Action	Pending Review				

Comments

General Comments No **Alternate Language Yes**

Related Modifications

202 (deleted, revised, new)

Summary of Modification

Provide flexibility required for residential construction projects as a result of FBC-Residential pointing to FBC-Building for code administration.

Rationale

The new definitions proposed for Building Designer and Building Designer in Responsible Charge are intended to address multiple problems. First, the code and its many referenced standards presently do not have a uniform term to reference the person who prepares construction documents. The proposed term of 'Building Designer' is used in ANSI/TPI 1, so it already has some recognition in the industry. Second, Florida allows unregistered persons to prepare construction documents for residential and small commercial construction. Florida extends this ability to property owners. The code includes the term 'Design Professional', but using that as the generic version of who prepared the construction documents adds an implied level of qualification that may not be appropriate in all cases; Building Designer is a more neutral term that is universally applicable. Additional construction documents should not include the documents that are common for the proposed type of construction; they should address how the proposed design will meet the intent of the code relative to those special conditions. Replacing "additional" with "supplemental" will reinforce that intent. (See attached file.)

Fiscal Impact Statement

Impact to local entity relative to enforcement of code
Clarification.
Impact to building and property owners relative to cost of compliance with code
Clarification.
Impact to industry relative to the cost of compliance with code
Clarification.
Impact to small business relative to the cost of compliance with code
Clarification.

Requirements

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

Strengthens or improves the code, and provides equivalent or better products, methods, or systems of construction
Clarification of current intent of Florida Statutes and the building code.

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

Does not degrade the effectiveness of the code
Clarification.

Alternate Language

2nd Comment Period

CA11911-A1

Proponent Jack Butler **Submitted** 8/17/2025 1:49:10 PM **Attachments** No

Rationale:

Some local governments have applied an understanding of these two terms that are presently undefined in the building code. Based on an opinion provided by ICC staff, these two new definitions will clarify the original intent and aid local building officials in enforcing the code's intent. (The ICC staff opinion was provided in a supporting file with the original code modification submission.) These two definitions, revised from the original proposal, as shown here, were accepted by the ICC Administration Committee during the CAH#1 hearings held in April 2025 for the 2027 edition of the model code.

Fiscal Impact Statement

Impact to local entity relative to enforcement of code

None. The proposed modification is a clarification of the original code intent.

Impact to building and property owners relative to cost of compliance with code

None. The proposed modification is a clarification of the original code intent.

Impact to industry relative to the cost of compliance with code

None. The proposed modification is a clarification of the original code intent.

Impact to small business relative to the cost of compliance with code

Clarification.

Requirements

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

Not applicable. The proposed modification is a clarification of the original code intent.

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

The modification, as revised in this comment, improves understanding of the code by clarifying the original intent.

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

Not applicable. The proposed modification is a clarification of the original code intent.

Does not degrade the effectiveness of the code

The modification, as revised in this comment, improves understanding of the code by clarifying the original intent. doing so will increase the effectiveness of the code.

CA11911-A1Text Modification

SECTION 202

DEFINITIONS

ADDITIONAL CONSTRUCTION DOCUMENTS. One or more supplemental construction documents not normally provided as part of the standard permit application package for the type of work proposed and that addresses one or more special conditions presented by the project.

SPECIAL CONDITIONS. Element of the construction site and/or design that is outside the parameters upon which the code is based or exceeds the prescriptive guidance found in the code and is unique to the project rather than generally applicable within the project area.

[All other content of the original proposed code modification is deleted. Only the two proposed new definitions, as listed above in their revised form, remain in force.]

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CA11911Text Modification

107 Submittal Documents.

[A] 107.3.4.1 Deferred submittals. Deferral of any submittal items shall have the prior approval of the *building official*. The ~~*registered design professional*~~ *building designer in responsible charge* shall list the *deferred submittals* on the *construction documents* for review by the *building official*.

~~Reserved.~~ The *building official* shall be authorized to require the *owner* or the *owner*'s authorized agent to engage and designate on the *building permit* application a *building designer* who shall act as the *building designer in responsible charge*. If the circumstances require, the *owner* or the *owner*'s authorized agent shall designate a substitute *building designer in responsible charge* who shall perform the duties required of the original *building designer in responsible charge*. The *building official* shall be notified in writing by the *owner* or the *owner*'s authorized agent if the *building designer in responsible charge* is changed or is unable to continue to perform the duties. The *building designer in responsible charge* shall be responsible for reviewing and coordinating submittal documents prepared by others, including phased and *deferred submittal* items, for compatibility with the design of the building. Where the laws of the jurisdiction require all construction documents to be prepared by a *registered design professional*, the *building designer in responsible charge* shall be a *registered design professional*.

...

[A] 107.3.4~~Design professional~~ Building designer in responsible charge.

Documents for *deferred submittal* items shall be submitted to the ~~*registered design professional*~~ *building designer in responsible charge* who shall review them and forward them to the *building official* with a notation indicating that the *deferred submittal* documents have been reviewed and found to be in general conformance to the design of the building. The *deferred submittal* items shall not be installed until the *deferred submittal* documents have been *approved* by the *building official*.

202 Definitions.

BUILDING DESIGNER. A person engaged by the *owner* or the *owner*'s authorized agent to prepare construction documents. Where required by law, the *building designer* shall be a *registered design professional*.

~~**[A] DESIGN PROFESSIONAL, REGISTERED.** See "Registered design professional."~~

~~**[A] DESIGN PROFESSIONAL IN RESPONSIBLE CHARGE, REGISTERED.** See "Registered design professional in responsible charge."~~

[A] REGISTERED DESIGN PROFESSIONAL. ~~An individual~~ A *building designer* who is registered or licensed to practice their respective design profession as defined by the statutory requirements of the professional registration laws of the state or jurisdiction in which the project is to be constructed. This includes any registered design professional so long as they are practicing within the scope of their license, which includes those licensed under Chapters 471 and 481, Florida Statutes.

[A] ~~REGISTERED DESIGN PROFESSIONAL~~ BUILDING DESIGNER IN RESPONSIBLE CHARGE. A ~~*registered design professional*~~ *building designer* engaged by the *owner* or the *owner*'s authorized agent to review and coordinate certain aspects of the project, as determined by the *building official*, for compatibility with the design of the building or *structure*, including submittal documents prepared by others, *deferred submittal* documents and phased submittal documents.

SPECIAL CONDITION. An element of the construction site or design that is outside the parameters upon which the code is based or exceeds the prescriptive guidance found in the code and is unique to the project rather than generally applicable within the project area. General project characteristics, such as size of the structure and the cost of construction, are not special conditions.

SUPPLEMENTAL CONSTRUCTION DOCUMENT. A construction document not normally provided as part of the standard *permit* application package for the type of work proposed that demonstrates how the proposed design addresses

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CA11911Text Modification

a *special condition* presented by the project so as to meet the intent of the code.

1703 Approvals.

1703.1.1 Independence. An *approved agency* shall be objective, competent and independent from the contractor responsible for the work being inspected. The agency shall disclose to the *building official* and the ~~*registered design professional*~~ *building designer in responsible charge* possible conflicts of interest so that objectivity can be confirmed.

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CA11911Rationale

abutler@mpzero.com

From: Christopher Reeves <jira@icc-ts.atlassian.net>
Sent: Monday, November 27, 2023 5:21 PM
To: abutler@mpzero.com
Subject: ICCTO-1865 Meaning of the terms 'special conditions' and 'additional construction documents'

_____
Reply above this line.

Christopher Reeves has commented on your request:

Jack Butler,

This email is in response to your email correspondence regarding “special conditions” and the need for “additional construction documents”. All comments are based on the 2018 International Building Code (IBC) unless noted otherwise.

As noted in Section 107.1, the building official is authorized to require “additional construction documents” to be prepared by a registered design professional where “special conditions” exist. Admittedly, while the code doesn’t define what constitutes “special conditions”, such conditions are typically matters not provided for or addressed by the code or proposed design alternatives to the basic provisions in the code as regulated by Section 104.11. For example, the code does not specifically address how to construct a chemical refinery or other special hazardous occupancies which may require unusual height or area limitations due to a specific process or equipment. Extremely large buildings may also warrant a specific egress design study to justify an additional exit access travel distance beyond basic code limitations. “Special conditions”, as alluded to in your correspondence, is not, in my opinion, necessarily related to the cost of the project or other local amendments.

As noted, “additional construction documents” could include drawings, structural calculations, research reports, test data or additional studies, prepared by a registered design professional, to substantiate equivalent compliance with the intent of the code with final approval subject to the building official.

If you would like to discuss this further, I can be reached directly at (888) 422-7233, X4309.

Sincerely,

Chris Reeves

Christopher R. Reeves, P.E.
Director, Architectural & Engineering Services
International Code Council, Inc.
Central Regional Office
888-ICC-SAFE (422-7233), x4309
creeves@iccsafe.org

You may reply to this email to add comments to your request.

Christopher Reeves resolved this as Answered.

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Mod_11911_Rationale_ICC Opinion email of 11-27-2023.pdf

CA11911Rationale

Code opinions issued by ICC staff are based on ICC-published codes and do not include local, state or federal codes, policies or amendments. This opinion is based on the information which you have provided. We have made no independent effort to verify the accuracy of this information nor have we conducted a review beyond the scope of your question. This opinion does not imply approval of an equivalency, specific product, specific design, or specific installation and cannot be published in any form implying such approval by the International Code Council. As this opinion is only advisory, the final decision is the responsibility of the designated authority charged with the administration and enforcement of this code..

How was our service for this request?

☆ ☆ ☆ ☆ ☆

Very poor Poor Average Good Very good

This is shared with abutler@mpzero.com.

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Mod_11911_Rationale_ICC Opinion email of 11-27-2023.pdf

TAC: Code Administration

Total Mods for **Code Administration** in **Denied : 7**

Total Mods for report: 7

Sub Code: Building

3

SP11962

Date Submitted	02/13/2025	**Section**	107.3.5	**Proponent**	Rebecca Quinn obo FL Div Emerg Mgnt
Chapter	1	**Affects HVHZ**	No	**Attachments**	**Yes**
TAC Recommendation	Denied				
Commission Action	Pending Review				

Comments

General Comments Yes **Alternate Language Yes**

Related Modifications

11963

Summary of Modification

Certain documentation is required for construction in flood hazard areas: elevation to which Lowest Floors are elevated, the elevation to which dry floodproofing will extend, and design of dry floodproofing. Proposal specifies use of FEMA certificates specifically designed for those purposes.

Rationale

Certain documentation is required to be submitted for construction in flood hazard areas: elevation to which Lowest Floors are elevated, the elevation to which dry floodproofing will extend, and design of dry floodproofing measures. The proposal specifies use of FEMA certificates that are specifically designed for those purposes. More than half of Florida NFIP communities participate in the NFIP Community Rating System (244 out of 469). A basic requirement for all CRS Communities is use of the FEMA Elevation Certificate. FDEM reports use of the Elevation Certificate by non-CRS Communities. FEMA requires use of the Dry Floodproofing Certificate when building owners obtain NFIP flood insurance policies that take into account the dry floodproofing measures. NFIP Elevation Certificate: FEMA Form FF-206-FY-22-152 (3/22) - fema_form-ff-206-fy-22-152.pdf NFIP Non-Residential Certificate for Non-Residential Structures: https://www.fema.gov/sites/default/files/documents/fema_form-ff-206-fy22-153.pdf

Fiscal Impact Statement

Impact to local entity relative to enforcement of code
Lessens burden caused when permittees use other forms of certification.
Impact to building and property owners relative to cost of compliance with code
None, because owners must submit the documentation in some form.
Impact to industry relative to the cost of compliance with code
The change does not affect the technical requirements of the code.
Impact to small business relative to the cost of compliance with code

The change does not affect the technical requirements of the code.

Requirements

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

Yes, especially the FEMA Dry Floodproofing Certificate because it requires certification of compliance with ASCE 24.

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

The change does not affect the technical requirements of the code.

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

The change does not affect the technical requirements of the code.

Does not degrade the effectiveness of the code

No; improves effectiveness because the FEMA Forms are designed to collect the information necessary to help determine compliance

Alternate Language

2nd Comment Period

SP11962-A3

Proponent Rebecca Quinn obo FL Div Emerg Mgnt **Submitted** 8/7/2025 7:57:00 AM **Attachments** No

Rationale:
Two things are changed in the comment. First, we removed the requirement to use the FEMA Elevation Certificate at the plan review stage. At that time, there is nothing to be surveyed and certified. Many communities request that the top sections of the form be completed (property location, FIRM panel, flood zone, BFE, etc.) so they can verify the information. This avoids having to make corrections when the form is submitted as required for inspections. We note that sec. 42.0366, F.S., requires surveyors to submit Elevation Certificates to FDEM (certificates are posted online and accessible to the public). Second, in every instance where a FEMA form is specified we added “or equivalent.” The value of the forms is the completeness of the requested information, which is still valuable even if provided in a substantially equivalent format.

Fiscal Impact Statement

Impact to local entity relative to enforcement of code
Lessens burden because whether FEMA form or equivalent is used, the information necessary is provided.

Impact to building and property owners relative to cost of compliance with code
None, because owners must submit the documentation in some form.

Impact to industry relative to the cost of compliance with code
The change does not affect the technical requirements of the code.

Impact to small business relative to the cost of compliance with code
The change does not affect the technical requirements of the code.

Requirements

Has a reasonable and substantial connection with the health, safety, and welfare of the general public
Improves compliance and ensures records are complete whether the FEMA forms or equivalents are used. The FEMA Dry Floodproofing Certificate because it requires certification of compliance with ASCE 24.

Strengthens or improves the code, and provides equivalent or better products, methods, or systems of construction
The change does not affect the technical requirements of the code.

Does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities
The change does not affect the technical requirements of the code.

Does not degrade the effectiveness of the code
No; improves effectiveness because whether the FEMA Forms or equivalent are used, the are designed to collect the information necessary to help determine compliance is provided.

2nd Comment Period

SP11962-G1

Proponent Rosanna Catalano Submitted 7/16/2025 8:41:45 AM Attachments Yes

Comment:

Please see the attached letter from my client, Garrison Flood. Thank you. Rosanna Catalano, Esq. rcatalano.arrow@gunster.com

SP11962-A3Text Modification

107.3.5 [Examination of Documents] Minimum plan review criteria for buildings. The examination of the documents by the building official shall include the following minimum criteria and documents: a floor plan; site plan; foundation plan; floor/roof framing plan or truss layout; all fenestration penetrations; flashing; and rough opening dimensions; and all exterior elevations:

Commercial Buildings: ***[partial shown]***

Building

1. Site requirements:

Flood hazard areas, flood zones, base flood elevations, and design flood elevations

8. Structural requirements shall include:

Flood requirements in accordance with Section 1612, including proposed lowest floor elevations, enclosures, flood damage-resistant materials, and dry floodproofing design certification on a FEMA Dry Floodproofing Certificate or equivalent

* * *

Residential (one- and two-family): ***[partial shown]***

6. Structural requirements shall include:

Flood hazard areas, flood zones, base flood elevations, design flood elevations, proposed lowest floor elevations, enclosures, equipment, and flood damage-resistant materials.

110.3 Required inspections. The building official upon notification from the permit holder or his or her agent shall make the following inspections, and shall either release that portion of the construction or shall notify the permit holder or his or her agent of any violations which must be corrected in order to comply with the technical codes. The building official shall determine the timing and sequencing of when inspections occur and what elements are inspected at each inspection.

Building *[partial shown]*

1. Foundation inspection. To be made after trenches are excavated and forms erected and shall at a minimum include the following building components:

·Stem-wall

·Monolithic slab-on-grade

·Piling/pile caps

·Footers/grade beams

1.1. In flood hazard areas, upon placement of the lowest floor, including basement, and prior to further vertical construction, the FEMA Elevation Certificate or equivalent ~~elevation certification~~ shall be submitted to the building official ~~authority having jurisdiction~~.

6. Final inspection. To be made after the building is completed and ready for occupancy.

6.1. In flood hazard areas, as part of the final inspection, a final FEMA Elevation Certificate or equivalent ~~certification~~ of the lowest floor elevation or an as-built FEMA Dry Floodproofing Certificate or equivalent for the elevation to which a building is dry floodproofed, as applicable, shall be submitted to the building official ~~authority having jurisdiction~~.

111.2 [Certificate of Occupancy] Certificate issued. After the *building official* inspects the building or structure and does not find violations of the provisions of this code or other laws that are enforced by the department of building safety, the *building official* shall issue a certificate of occupancy that contains the following: *[partial shown]*

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6. For buildings and structures in flood hazard areas, a statement that documentation of the as-built lowest floor elevation has been provided and is retained in the records of the building official ~~authority having jurisdiction~~.

1612.5 Flood hazard documentation. The following documentation shall be prepared and sealed by a licensed professional surveyor and mapper or a registered design professional, as applicable, and submitted to the building official:

1. For construction in flood hazard areas other than coastal high hazard areas or coastal A zones:

1.1 The elevation of the lowest floor, including the basement, provided on a FEMA Elevation Certificate or equivalent as required by the lowest floor elevation inspection in Section 110.3, Building, 1.1 and for the final inspection in Section 110.3, Building, 6.1.

1.2 For fully enclosed areas below the design flood elevation where provisions to allow for the automatic entry and exit of floodwaters do not meet the minimum requirements in Section 2.7.2.1 of ASCE 24, construction documents shall include a statement that the design will provide for equalization of hydrostatic flood forces in accordance with Section 2.7.2.2 of ASCE 24.

1.3. For dry floodproofed nonresidential buildings, construction documents shall include a statement provided on a FEMA Dry Floodproofing Certificate or equivalent that the dry floodproofing is designed in accordance with ASCE 24 and shall include the flood emergency plan specified in Chapter 6 of ASCE 24.

1.4 For *dry floodproofed* nonresidential buildings, the elevation to which the building is *dry floodproofed* provided on a FEMA Dry Floodproofing Certificate or equivalent as required for the final inspection in Section 110.3, Building, 6.1.

2. For construction in coastal high hazard areas and coastal A zones:

2.1 The elevation of the bottom of the lowest horizontal structural member provided on a FEMA Elevation Certificate or equivalent as required by the lowest floor elevation inspection in Section 110.3, Building, 1.1 and for the final inspection in Section 110.3, Building, 5.1.

2.2 Construction documents shall include a statement that the building is designed in accordance with ASCE 24, including that the pile or column foundation and building or structure to be attached thereto is designed to be anchored to resist flotation, collapse and lateral movement due to the effects of wind and flood loads acting simultaneously on all building components, and other load requirements of Chapter 16.

2.3 For breakaway walls designed to have a resistance of more than 20 psf (0.96 kN/m2) determined using allowable stress design, construction documents shall include a statement that the breakaway wall is designed in accordance with ASCE 24.

2.4 For breakaway walls where provisions to allow for the automatic entry and exit of floodwaters do not meet the minimum requirements in Section 2.7.2.1 of ASCE 24, construction documents shall include a statement that the design will provide for equalization of hydrostatic flood forces in accordance with Section 2.7.2.2 of ASCE 24.

SP11962Text Modification

107.3.5 [Examination of Documents] Minimum plan review criteria for buildings. The examination of the documents by the building official shall include the following minimum criteria and documents: a floor plan; site plan; foundation plan; floor/roof framing plan or truss layout; all fenestration penetrations; flashing; and rough opening dimensions; and all exterior elevations:

Commercial Buildings: ***[partial shown]***

Building

1. Site requirements:

Flood hazard areas, flood zones, base flood elevations, and design flood elevations

8. Structural requirements shall include:

Flood requirements in accordance with Section 1612, including proposed lowest floor elevations provided on a FEMA Elevation Certificate, enclosures, flood damage-resistant materials, and dry floodproofing design certification on a FEMA Dry Floodproofing Certificate

* * *

Residential (one- and two-family): ***[partial shown]***

6. Structural requirements shall include:

Flood hazard areas, flood zones, base flood elevations, design flood elevations, proposed lowest floor elevations provided on a FEMA Elevation Certificate, enclosures, equipment, and flood damage-resistant materials.

110.3 Required inspections. The building official upon notification from the permit holder or his or her agent shall make the following inspections, and shall either release that portion of the construction or shall notify the permit holder or his or her agent of any violations which must be corrected in order to comply with the technical codes. The building official shall determine the timing and sequencing of when inspections occur and what elements are inspected at each inspection.

Building *[partial shown]*

1. Foundation inspection. To be made after trenches are excavated and forms erected and shall at a minimum include the following building components:

·Stem-wall

·Monolithic slab-on-grade

·Piling/pile caps

·Footers/grade beams

1.1. In flood hazard areas, upon placement of the lowest floor, including basement, and prior to further vertical construction, the FEMA Elevation Certificate ~~elevation certification~~ shall be submitted to the building official ~~authority having jurisdiction~~.

6. Final inspection. To be made after the building is completed and ready for occupancy.

6.1. In flood hazard areas, as part of the final inspection, a final FEMA Elevation Certificate ~~certification~~ of the lowest floor elevation or an as-built FEMA Dry Floodproofing Certificate for the elevation to which a building is dry floodproofed, as applicable, shall be submitted to the building official ~~authority having jurisdiction~~.

111.2 [Certificate of Occupancy] Certificate issued. After the *building official* inspects the building or structure and does not find violations of the provisions of this code or other laws that are enforced by the department of building safety, the *building official* shall issue a certificate of occupancy that contains the following: ***[partial shown]***

6. For buildings and structures in flood hazard areas, a statement that documentation of the as-built lowest floor elevation has been provided and is retained in the records of the building official ~~authority having jurisdiction.~~

1612.5 Flood hazard documentation. The following documentation shall be prepared and sealed by a licensed professional surveyor and mapper or a registered design professional, as applicable, and submitted to the building official:

1. For construction in flood hazard areas other than coastal high hazard areas or coastal A zones:

    1.1. The elevation of the lowest floor, including the basement, provided on a FEMA Elevation Certificate as required by the lowest floor elevation inspection in Section 110.3, Building, 1.1 and for the final inspection in Section 110.3, Building, 6.1.

Page: 1

Mod11962_TextOfModification.pdf

SP11962Text Modification

1.2 For fully enclosed areas below the design flood elevation where provisions to allow for the automatic entry and exit of floodwaters do not meet the minimum requirements in Section 2.7.2.1 of ASCE 24, construction documents shall include a statement that the design will provide for equalization of hydrostatic flood forces in accordance with Section 2.7.2.2 of ASCE 24.

1.3. For dry floodproofed nonresidential buildings, construction documents shall include a statement provided on a FEMA Dry Floodproofing Certificate that the dry floodproofing is designed in accordance with ASCE 24 and shall include the flood emergency plan specified in Chapter 6 of ASCE 24.

1.4 For *dry floodproofed* nonresidential buildings, the elevation to which the building is *dry floodproofed* provided on a FEMA Dry Floodproofing Certificate as required for the final inspection in Section 110.3, Building, 6.1.

2. For construction in coastal high hazard areas and coastal A zones:

2.1. The elevation of the bottom of the lowest horizontal structural member provided on a FEMA Elevation Certificate as required by the lowest floor elevation inspection in Section 110.3, Building, 1.1 and for the final inspection in Section 110.3, Building, 5.1.

2.2. Construction documents shall include a statement that the building is designed in accordance with ASCE 24, including that the pile or column foundation and building or structure to be attached thereto is designed to be anchored to resist flotation, collapse and lateral movement due to the effects of wind and flood loads acting simultaneously on all building components, and other load requirements of Chapter 16.

2.3. For breakaway walls designed to have a resistance of more than 20 psf (0.96 kN/m^2) determined using allowable stress design, construction documents shall include a statement that the breakaway wall is designed in accordance with ASCE 24.

2.4 For breakaway walls where provisions to allow for the automatic entry and exit of floodwaters do not meet the minimum requirements in Section 2.7.2.1 of ASCE 24, construction documents shall include a statement that the design will provide for equalization of hydrostatic flood forces in accordance with Section 2.7.2.2 of ASCE 24.

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Mod11962_TextOfModification.pdf

Public Comments to the Florida Division of Emergency Management, MOD #11962, Sec. 107.3.5
From: Arnon Rosen, CEO & President, Garrison Flood, arnon@garrisonflood.com
Date: June 30, 2025

Dear Members of the Florida Building Commission, Building Structural Technical Advisory Committee,

As the CEO of Garrison Flood, a Florida-based manufacturer and installer of emergency flood mitigation panels, I appreciate the Division's ongoing commitment to the safety and resilience of our state's communities. I am writing to highlight a critical issue in the current regulatory framework that affects the ability of homeowners to protect their properties from flood damage, and to respectfully request clarification and action to address this gap.

Rationale for Allowing Retrofit of Flood Mitigation Products Below BFE

We seek clarification on the rationale behind the current prohibition on retrofitting existing residential structures below the Base Flood Elevation (BFE) with flood mitigation products, even when a qualified engineer can demonstrate that the structure is capable of withstanding the necessary hydrostatic and hydrodynamic loads. Notably, the code permits—and in some cases mandates—such retrofits for mixed-use and commercial structures, yet does not extend the same allowance to residential properties. This inconsistency raises questions about the underlying reasoning and creates barriers for homeowners seeking to enhance their flood protection.

Gap in Code Provisions for Temporary Flood Mitigation Solutions

The Florida Building Code (FBC) and ASCE 24-14 provide comprehensive requirements for flood protection in new construction and substantial improvements. However, they do not adequately address the use of temporary or removable flood mitigation products—such as aluminum flood panels—particularly for retrofitting existing residential structures. This omission has led to inconsistent interpretations among local building departments. Some departments prohibit the use of such panels entirely, while others apply requirements intended for new construction, which are often impractical or unnecessarily burdensome for retrofit applications.

Need for a Dedicated "Mitigation" Category

Temporary flood mitigation panels are a proven, cost-effective, and environmentally friendly solution that can be rapidly deployed to protect homes and businesses from floodwaters. These panels are designed for easy installation and removal, safeguarding vulnerable openings without redirecting water to neighboring properties. Their use can significantly reduce property damage, lower recovery costs, and support community resilience in the face of increasing hurricane activity and rising sea levels.

Despite these benefits—including flood protection, job creation, minimized environmental impact, and the potential to reduce insurance costs—these products are not contemplated in the current code framework. The absence of clear standards for temporary flood mitigation products creates

uncertainty for manufacturers, installers, and homeowners, and may result in the use of inferior products.

Challenges with Current Code Interpretation

The lack of clarity in the FBC has resulted in a patchwork of local requirements. In many cases, building departments apply the same requirements to existing homes as to new construction, which are not always feasible or appropriate for retrofitting. This not only discourages the adoption of effective mitigation measures but also places an undue burden on homeowners and manufacturers striving to comply with the intent of the code. Importantly, these mitigation panels are not intended to replace building requirements for substantial improvements where homes have already suffered significant damage and are required to elevate in the rebuild. Our intent is not to recommend anything that would degrade a community's NFIP rating, but rather to make it more straightforward for homeowners to install temporary flood barriers to safeguard their homes and garages.

Request for Guidance and Action

We respectfully request that the Division:

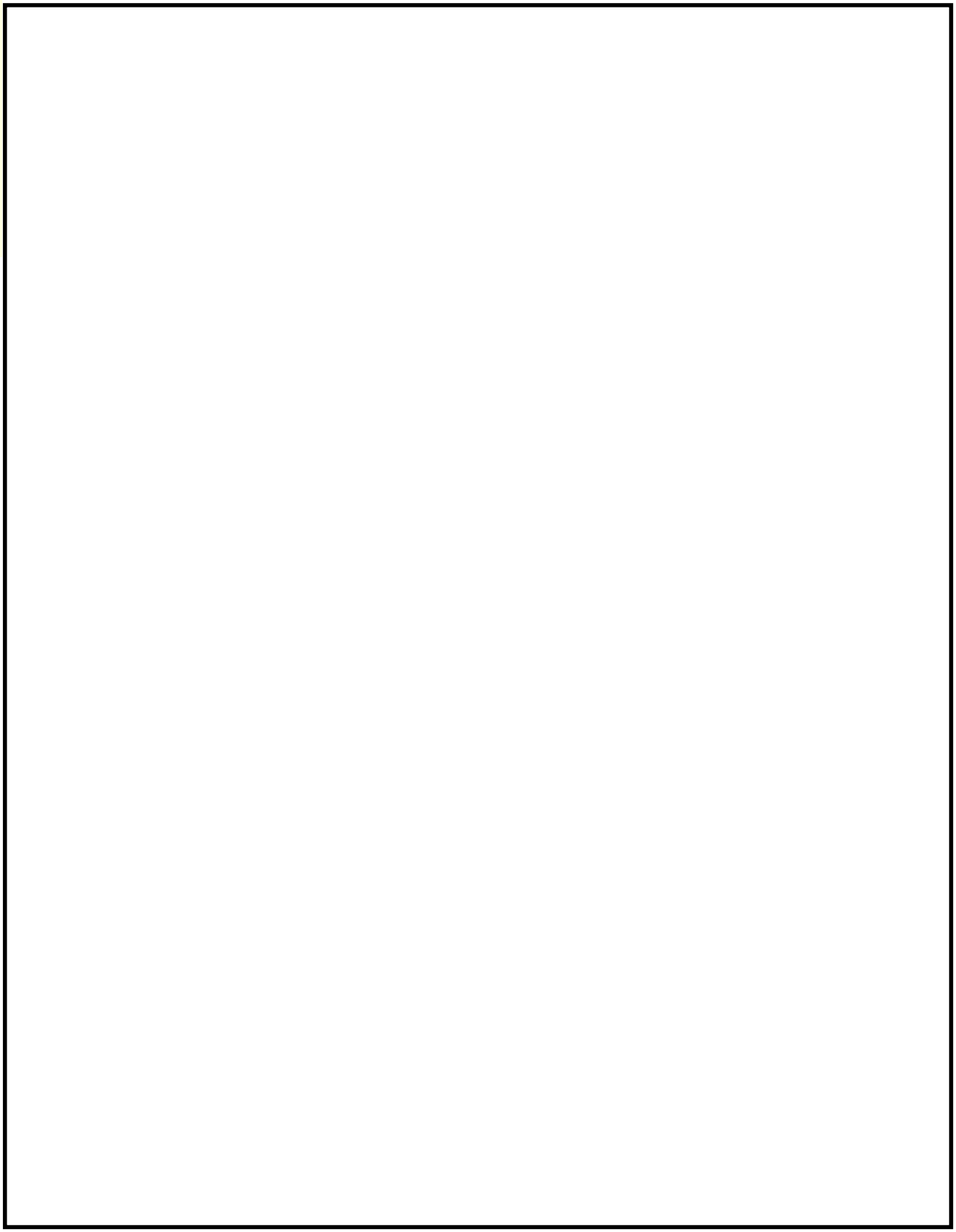
- Provide the rationale for prohibiting retrofit of flood mitigation products on existing residential structures that are below the BFE and not required to elevate, when an engineer can demonstrate structural adequacy for hydrostatic and hydrodynamic loads and the products won't impact adjacent structures.
- Engage with stakeholders—including manufacturers, installers, local governments, and the insurance industry—to develop standards that ensure safety and effectiveness without imposing unnecessary barriers to adoption.
- Facilitate the installation process for temporary flood barriers, enabling homeowners to more readily protect their residences and garages from flood risks.

We are committed to working collaboratively with the Division and other stakeholders to ensure that these innovative products are properly evaluated and approved for use in Florida. We have already engaged with DBPR staff on product approval and are in the process of submitting our product for approval in the coming months. However, we believe that product approval alone will not fully address the issue, and we welcome any suggestions or guidance regarding the most effective approach to achieving this goal.

Thank you for your attention to this important matter. We look forward to your response and to supporting the Division's efforts to enhance the resilience of Florida's communities.

Respectfully,
Arnon Rosen
CEO & President
Garrison Flood
arnon@garrisonflood.com

SP11962-G1General Comment



Mod_11962_G1_General_Garrison Flood - Public Comment - FDEM July 2025 v1.pdf

TAC: Code Administration

Total Mods for **Code Administration** in **Denied : 7**

Total Mods for report: 7

Sub Code: Building

4

CA11993

Date Submitted	02/11/2025	**Section**	105.2	**Proponent**	James Schock
Chapter	1	**Affects HVHZ**	No	**Attachments**	Yes
TAC Recommendation	Denied				
Commission Action	Pending Review				

Comments

General Comments Yes **Alternate Language Yes**

Related Modifications

Summary of Modification

This change removes permitting requirements for accessibility renovations to One and Two Family Dwellings providing an accessible entry and path of travel through the dwelling unless, it involves structural bearing walls.

Rationale

The reason for this modification is that the Florida Accessibility code does not apply to one and two family dwellings, therefore there is no code requirements specified other than the statutory 29 inch clear bathroom door.

Fiscal Impact Statement

Impact to local entity relative to enforcement of code
No impact.
Impact to building and property owners relative to cost of compliance with code
No cost impact however it will assist persons with disablities to adapt their homes and allow for longer independent living to occur
Impact to industry relative to the cost of compliance with code
None
Impact to small business relative to the cost of compliance with code
Reduces cost of permitting to the disabled community.

Requirements

Has a reasonable and substantial connection with the health, safety, and welfare of the general public
Helps provide the disabled and senior population with the ability to continue independent living as long as possible
Strengthens or improves the code, and provides equivalent or better products, methods, or systems of construction

The Florida accessibility code does not apply to One and Two Family Dwellings other than requiring a 29 inch door in the bathroom. Therefore there really is no possible code review.

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

This Modification does not discriminate against any materials, products or systems

Does not degrade the effectiveness of the code

This modification only eliminates permitting requirements for an issue that is not addressed by the code.

Alternate Language

2nd Comment Period

FCA11993-A2

Proponent James Schock **Submitted** 7/16/2025 11:30:50 AM **Attachments** Yes

Rationale:

Based on public comment from the First Hearings. This is an effort to address some of the concerns. This alternate language provides limitations on ramp height and is more specific on what items would be exempt from permitting.

Fiscal Impact Statement

Impact to local entity relative to enforcement of code
It will reduce workload with no significant impact

Impact to building and property owners relative to cost of compliance with code
Reduces cost of compliance. No permitting fee

Impact to industry relative to the cost of compliance with code
Non

Impact to small business relative to the cost of compliance with code
Reduces cost of permitting to the disabled community.

Requirements

Has a reasonable and substantial connection with the health, safety, and welfare of the general public
Provides support to the disabled and senior community.

Strengthens or improves the code, and provides equivalent or better products, methods, or systems of construction
Delays in permitting has delayed disabled and seniors from coming home after rehab or other medical stays waiting on permits to be processed.

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

Does not degrade the effectiveness of the code
The code requirements remain in place this change only effects permitting.

2nd Comment Period

CA11993-G5

Proponent ROSEMARY MILES Submitted 8/15/2025 1:43:10 PM Attachments Yes

Comment:

Over the past two fiscal years, 95 individuals from diverse backgrounds and walks of life were supported with essential home accessibility modifications through our organization. These changes were life changing. They enabled people to return home from hospitals or nursing facilities, and empowered others to remain in their own homes with greater safety, dignity, and independence. Each of these individuals faced unique challenges. Some were recovering from surgery or injury, while others were navigating the long-term impacts of disability, aging, or chronic illness. For all of them, having a home environment that supported their daily living needs made a profound difference. Yet, despite these efforts, about half of those served still faced significant barriers. Some remained in institutional settings longer than necessary due to delays in receiving modifications due to permit requirements to safely access their home. Others continued to struggle with limited accessibility in their homes, which restricted their ability to fully engage in daily tasks such as bathing, cooking, or simply moving from room to room with ease. These experiences highlight the ongoing need for timely, person-centered support to ensure that everyone, regardless of age, ability, or circumstance can live safely and independently in a home that meets their needs. Recognizing these ongoing challenges, communities are looking at systemic ways to reduce obstacles. One promising step is removing permitting requirements for accessibility renovations to One- and Two-Family Dwellings, specifically when the changes are aimed at creating an accessible entry and path of travel through the home, unless the renovations involve structural bearing walls. By easing these permitting requirements, municipalities can support quicker, more cost-effective improvements without compromising safety. This thoughtful adjustment allows local governments to uphold building code integrity while removing bureaucratic delays that can hinder a person's ability to live independently at home.

CA11993-A2Text Modification

Proposed alternate revised language:

[A] 105.2 Work exempt from permit. Exemptions from permit requirements of this code shall not be deemed to grant authorization for any work to be done in any manner in violation of the provisions of this code. Permits shall not be required for the following:

Accessibility:
Renovation of an existing ~~residential~~ One and Two Family Dwelling for purposes of providing accessibility access to and throughout the dwelling including ramps with rise of 48 inches or less, alteration to widen openings of interior doors, grab bars, and fixtures. This exemption does not include replacement of any exterior door or any interior or exterior structural element. ~~path of travel through the dwelling to provide for an accessible route shall not require a permit unless it involves the renovation of an existing bearing wall.~~

Gas:
1. Portable heating appliance.
2. Replacement of any minor part that does not alter approval of equipment or make such equipment unsafe.

Page: 1

Mod11993_A2_TextOfModification.pdf

CA11993Text Modification

[A] 105.2 Work exempt from permit. Exemptions from permit requirements of this code shall not be deemed to grant authorization for any work to be done in any manner in violation of the provisions of this code. Permits shall not berequired for the following:

Accessibility:
Renovation of an existing residential One and Two Family Dwelling providing access too or path of travel through the dwelling to provide for an accessible route shall not require a permit unless it involves the renovation of an existing bearing wall.

Gas:
1. Portable heating appliance.
2. Replacement of any minor part that does not alter approval of equipment or make such equipment unsafe.

Page: 1

Mod11993_TextOfModification.pdf

RCDS
Resource Center for Disability Solutions

August 15, 2025

Public Comment CA11993-G5

Over the past two fiscal years, 95 individuals from diverse backgrounds and walks of life were supported with essential home accessibility modifications through our organization. These changes were life changing. They enabled people to return home from hospitals or nursing facilities, and empowered others to remain in their own homes with greater safety, dignity, and independence.

Each of these individuals faced unique challenges. Some were recovering from surgery or injury, while others were navigating the long-term impacts of disability, aging, or chronic illness. For all of them, having a home environment that supported their daily living needs made a profound difference.

Yet, despite these efforts, about half of those served still faced significant barriers. Some remained in institutional settings longer than necessary due to delays in receiving modifications due to permit requirements to safely access their home. Others continued to struggle with limited accessibility in their homes, which restricted their ability to fully engage in daily tasks such as bathing, cooking, or simply moving from room to room with ease.

These experiences highlight the ongoing need for timely, person-centered support to ensure that everyone, regardless of age, ability, or circumstance can live safely and independently in a home that meets their needs.

Recognizing these ongoing challenges, communities are looking at systemic ways to reduce obstacles. One promising step is removing permitting requirements for accessibility renovations to One- and Two-Family Dwellings, specifically when the changes are aimed at creating an accessible entry and path of travel through the home, unless the renovations involve structural bearing walls.

By easing these permitting requirements, municipalities can support quicker, more cost-effective improvements without compromising safety. This thoughtful adjustment allows local governments to uphold building code integrity while removing bureaucratic delays that can hinder a person's ability to live independently at home.

Brevard
571 Haverty Ct., Suite A
Rockledge, FL 32955
321-633-6011

Indian River
1400 27th St., Room 208
Vero Beach, FL 32960
772-774-306

Florida TTY: 1-800-955-8771

RCDSFL.org

CA11993-A2Rationale

Proposed alternate revised language:

[A] 105.2 Work exempt from permit. Exemptions from permit requirements of this code shall not be deemed to grant authorization for any work to be done in any manner in violation of the provisions of this code. Permits shall not be required for the following:

Accessibility:
Renovations to an existing one and two family dwelling for purposes of providing accessibility access to and throughout dwelling including ramps with rise of 48 inches or less, alteration to widen openings of interior doors, grab bars, and fixtures. This exemption does not include replacement of any exterior door or any interior or exterior structural element.

Gas:
1. Portable heating appliance.
2. Replacement of any minor part that does not alter approval of equipment or make such equipment unsafe.

Page: 1

Mod_11993_A2_Rationale_Proposed alternate revised language.pdf

TAC: Code Administration

Total Mods for **Code Administration** in **Denied : 7**

Total Mods for report: 7

Sub Code: Building

5

CA12098

Date Submitted	02/13/2025	**Section**	107.3.5	**Proponent**	Shane Gerwig
Chapter	1	**Affects HVHZ**	No	**Attachments**	**Yes**
TAC Recommendation	Denied				
Commission Action	Pending Review				

Comments

General Comments No **Alternate Language Yes**

Related Modifications

N/A

Summary of Modification

During discussion of Declaratory Statement DS 2024-002, it was evident that the application of this section is confusing and not consistently administered throughout Florida. This adds numbering structure consistent with framework throughout the code.

Rationale

This modification editorially structures this section consistent with the rest of the code. Dring consideration of Declaratory Statement DS 2024-002 it was evident that this section was not uniformly applied throughout Florida. This modification provides framework to the existing language of the code to improved consistency with the application of this section.

Fiscal Impact Statement

Impact to local entity relative to enforcement of code
Editorial modification only. Will not have financial impact. May increase efficiency.

Impact to building and property owners relative to cost of compliance with code
Editorial modification only. Will not have financial impact.

Impact to industry relative to the cost of compliance with code
Editorial modification only. Will not have financial impact.

Impact to small business relative to the cost of compliance with code
Editorial modification only. Will not have financial impact.

Requirements

Has a reasonable and substantial connection with the health, safety, and welfare of the general public
Adds clarity to code.

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

Adds clarity to code.

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

Does not change the technical elements of the code and does not discriminate against materials, products, methods, or systems of construction.

Does not degrade the effectiveness of the code

This modification does not degrade the effectiveness of the code.

Alternate Language

2nd Comment Period

FC-A12098-A1

Proponent Shane Gerwig **Submitted** 8/7/2025 7:41:24 PM **Attachments** Yes

Rationale:

The alternate language for this modification addresses stakeholder comments provided during the technical advisory committee meetings. This needed clarification provides consistency and layout that is consistent with the framework and numbering of the Florida Building Code.

Fiscal Impact Statement

Impact to local entity relative to enforcement of code

This is clarification only and has no impact.

Impact to building and property owners relative to cost of compliance with code

This is clarification only and has no impact.

Impact to industry relative to the cost of compliance with code

This is clarification only and has no impact.

Impact to small business relative to the cost of compliance with code

Editorial modification only. Will not have financial impact.

Requirements

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

The alternate language clarifies the code making the Florida Building Code easier to understand.

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

The alternate language clarifies the code making the Florida Building Code easier to understand.

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

Does not discriminate. The proposed language is administrative.

Does not degrade the effectiveness of the code

This clarification does not degrade the effectiveness of the code.

107.3.5 Minimum plan review criteria for buildings. Theexaminationofthedocumentsbythebuildingofficial shall include the following minimum criteria and documents: a floor plan; site plan; foundation plan; floor/roof framing plan or truss layout; all fenestration penetrations; flashing; and rough opening dimensions; and all exterior elevations:

107.3.5.1 CommercialBuildings:

107.3.5.1.1Building:

Siterequirements:

Parking Fireaccess
Vehicle loading Driving/turningradius
Firehydrant/watersupply/postindicator valve (PIV)

Setback/separation(assumedpropertylines)

Locationofspecifictanks,waterlinesand sewer lines
Floodhazardareas,floodzones,anddesign flood elevations

2. Occupancygroupandspecialoccupancyrequirements shall be determined.
3. Minimumtypeofconstructionshallbedeter- mined (see Table 504.3a).
4. Fire-resistantconstructionrequirementsshall include the following components:

Fire-resistantseparations
Fire-resistantprotectionfortypeofconstruction Protection of openings and penetrations of

ratedwalls

Fireblockinganddraftstoppingand calculated fire resistance

5. Firesuppressionsystemsshallinclude:

Earlywarningsmokeevacuationsystems Schematic fire sprinklers

Standpipes

Pre-engineeredsystems Riser diagram.

6. Lifesafetysystemsshallbedeterminedand shall include the following requirements:

Occupantloadandegresscapacities Early warning
Smoke control Stairpressurization Systemsschematic

7. Occupancy load/egress requirements shall include:

Occupancyload Gross

Net

Meansofegress Exit access

Exit

Exitdischarge

Stairsconstruction/geometryandprotection Doors
Emergencylightingandexitsigns Specific occupancy requirements Construction requirements Horizontalexits/exitpassageways

Structuralrequirementsshallinclude: Soil conditions/analysis

Termiteprotection Design loads
Windrequirements Building envelope
Impactresistantcoveringsorsystems Structural calculations (if required) Foundation
Flood requirements in accordance with Section 1612, including lowest floor elevations,enclosures,flooddamage- resistant materials
Wall systems Floorsystems

Roofsystems

Thresholdinspectionplan Stair systems

9. Materials shall be reviewed and shall at a mini- mum include the following:

Wood Steel Aluminum Concrete Plastic Glass Masonry
Gypsumboardandplaster Insulating (mechanical) Roofing

Insulation

10. Accessibilityrequirementsshallincludethefol- lowing:

Site requirements Accessible route Verticalaccessibility
Toiletandbathingfacilities Drinking fountains Equipment
Specialoccupancyrequirements Fair housing requirements

11. Interiorrequirementsshallincludethefollow- ing:

Interiorfinishes(flamespread/smoke development)
Lightandventilation Sanitation

12. Specialsystems:

Elevators Escalators Lifts

13. Swimmingpools:

Barrierrequirements Spas

Wadingpools

14. Location and installation details. The specific location and installation details of each fire door, fire damper, ceiling damper and smoke damper shall be shown and properly identified on the building plans by the designer.

107.3.5.1.2Electrical:

~~Electrical:~~

Wiring Services
Feedersandbranchcircuits Overcurrent protection Grounding
Wiringmethodsandmaterials GFCIs

Equipment

Specialoccupancies

Emergencysystems

Communicationsystems

Lowvoltage

Loadcalculations

Designfloodelevation

107.3.5.1.3 Plumbing:

Minimumplumbingfacilities

Fixturerequirements

Watersupplypiping

Sanitarydrainage

Waterheaters

Vents

Roofdrainage

Backflowprevention

Irrigation

Locationofwatersupplyline

Greasetraps

Environmentalrequirements

Plumbingriser

Designfloodelevation

107.3.5.1.4Mechanical:

Energycalculations

Exhaust systems: Clothesdryerexhaust

Kitchenequipmentexhaust

Specialtyexhaustsystems

Equipment

Equipmentlocation

Make-upair

Roof-mountedequipment

Ductsystems

Ventilation

Combustionair
Chimneys,fireplacesandvents
Appliances
Boilers
Refrigeration
Bathroomventilation
Laboratory
Designfloodelevation

107.3.5.1.5Gas:

Gaspiping
Venting
Combustionair
Chimneysandvents
Appliances
Typeofgas
Fireplaces
LPtank location
Riserdiagram/shutoffs
Designfloodelevation

107.3.5.2 Demolition:

Asbestosremoval

107.3.5.3 Residential(one-andtwo-family):

Siterequirements:
Setback/separation(assumedpropertylines) Location of septic tanks
Fire-resistantconstruction(ifrequired)
Fire
Smokedetectorlocations

Egress:
Egresswindowsizeandlocationstairs construction requirements

Structuralrequirementsshallinclude:
Wallsectionfromfoundationthroughroof, including assembly and materials connector tables wind requirements structural calculations (if required)
Flood hazard areas, flood zones, design flood elevations, lowest floor elevations, enclosures,equipment,andflooddamage-resistant materials

Accessibilityrequirements: Show/identify
Accessiblebath

Impactresistantcoveringsorsystems

107.3.5.4 Exemptions:

Plans examination by the building official shall not be required for the following work:
Replacingexistingequipmentsuchasmechanical units, water heaters, etc.
Reroofs
Minorelectrical,plumbingandmechanical repairs
Annualmaintenancepermits

Prototypeplans:
Exceptforlocalsiteadaptions,siding, foundations and/or modifications.
Exceptforstructuresthatrequirewaiver.

Manufacturedbuildingsplanexceptforfoundations and modifications of buildings on site.

107.3.5 Minimum plan review criteria for buildings. The examination of the documents by the building official shall include the following minimum criteria and documents: a floor plan; site plan; foundation plan; floor/roof framing plan or truss layout; all fenestration penetrations; flashing; and rough opening dimensions; and all exterior elevations:

107.3.5.1 Commercial Buildings:

107.3.5.1.1 Building:

1. Site requirements:

   Parking Fire access
   Vehicle loading Driving/turning radius
   Fire hydrant/water supply/post indicator valve (PIV)
   Set back/separation (assumed property lines)
   Location of specific tanks, water lines and sewer lines
   Flood hazard areas, flood zones, and design flood elevations

2. Occupancy group and special occupancy requirements shall be determined.
3. Minimum type of construction shall be deter- mined (see Table 504.3a).
4. Fire-resistant construction requirements shall include the following components:

   Fire-resistant separations
   Fire-resistant protection for type of construction Protection of openings and penetrations of rated walls
   Fire blocking and draftstopping and calculated fire resistance

5. Fire suppression systems shall include:

   Early warning smoke evacuation systems Schematic fire sprinklers
   Standpipes
   Pre-engineered systems Riser diagram.

6. Life safety systems shall be determined and shall include the following requirements:

   Occupant load and egress capacities Early warning
   Smoke control Stair pressurization Systems schematic

7. Occupancy load/egress requirements shall include:

   Occupancy load Gross
   Net
   Means of egress Exit access
   Exit
   Exit discharge
   Stairs construction/geometry and protection Doors
   Emergency lighting and exit signs Specific occupancy requirements Construction requirements Horizontal exits/exit passageways

8. Structural requirements shall include: Soil conditions/analysis
   Termite protection Design loads
   Wind requirements Building envelope
   Impact resistant coverings or systems Structural calculations (if required) Foundation
   Flood requirements in accordance with Section 1612, including lowest floor elevations, enclosures, flood damage- resistant materials
   Wall systems Floor systems
   Roof systems
   Threshold inspection plan Stair systems

9. Materials shall be reviewed and shall at a mini- mum include the following:

   Wood Steel Aluminum Concrete Plastic Glass
   Masonry
   Gypsum board and plaster Insulating (mechanical) Roofing
   Insulation

10. Accessibility requirements shall include the fol- lowing:

Site requirements Accessible route Vertical accessibility
Toilet and bathing facilities Drinking fountains Equipment
Special occupancy requirements Fair housing requirements

11. Interior requirements shall include the follow- ing:

    Interior finishes (flame spread/smoke development)
    Light and ventilation Sanitation

12. Special systems:

    Elevators Escalators Lifts

13. Swimming pools:

    Barrier requirements Spas
    Wading pools

14. Location and installation details. The specific location and installation details of each fire door, fire damper, ceiling damper and smoke damper shall be shown and properly identified on the building plans by the designer.

107.3.5.1.2 Electrical:

~~Electrical:~~

Wiring Services
Feeders and branch circuits Overcurrent protection Grounding
Wiring methods and materials GFCIs

Equipment
Special occupancies
Emergency systems
Communication systems
Low voltage
Load calculations
Design flood elevation

107.3.5.1.3 Plumbing:

Minimum plumbing facilities
Fixture requirements
Water supply piping
Sanitary drainage
Water heaters
Vents
Roof drainage
Back flow prevention
Irrigation
Location of water supply line
Grease traps
Environmental requirements
Plumbing riser
Design flood elevation

107.3.5.1.4 Mechanical:

Energy calculations

Exhaust systems: Clothes dryer exhaust
    Kitchen equipment exhaust
    Specialty exhaust systems

Equipment
Equipment location
Make-up air
Roof-mounted equipment
Duct systems

Ventilation
Combustion air
Chimneys, fireplaces and vents
Appliances
Boilers
Refrigeration
Bathroom ventilation
Laboratory
Design flood elevation

107.3.5.1.5 Gas:

Gas piping
Venting
Combustion air
Chimneys and vents
Appliances
Type of gas
Fireplaces
LP tank location
Riser diagram/shutoffs
Design flood elevation

107.3.5.2 Demolition:

Asbestos removal

107.3.5.3 Residential (one- and two-family):

Site requirements:

Set back/separation (assumed property lines) Location of septic tanks
Fire-resistant construction (if required)
Fire
Smoke detector locations

Egress:

Egress window size and location stairs construction requirements

Structural requirements shall include:

Wall section from foundation through roof, including assembly and materials connector tables wind requirements structural calculations (if required)
Flood hazard areas, flood zones, design flood elevations, lowest floor elevations, enclosures, equipment, and flood damage- resistant materials

Accessibility requirements: Show/identify
Accessible bath

Impact resistant coverings or systems

107.3.5.4 Exemptions:

Plans examination by the building official shall not be required for the following work:

Replacing existing equipment such as mechanical units, water heaters, etc.
Reroofs
Minor electrical, plumbing and mechanical repairs
Annual maintenance permits
Prototype plans:

Except for local site adaptions, siding, foundations and/or modifications.
Except for structures that require waiver.

Manufactured buildings plan except for foundations and modifications of buildings on site.

CA12098Text Modification

See attached file.

Mod12098_TextOfModification.pdf

Page: 1

107.3.5 ~~Minimum p~~Plan review criteria for buildings. The examination of the documents by the building official shall include the following ~~minimum~~ criteria and documents: a floor plan; site plan; foundation plan; floor/roof framing plan or truss layout; all fenestration penetrations; flashing; and rough opening dimensions; and all exterior elevations:

107.3.5.1 Commercial Buildings:

107.3.5.1.1 Building:

1. Site requirements:

   Parking Fire access
   Vehicle loading Driving/turning radius
   Fire hydrant/water supply/post indicator valve (PIV)
   Set back/separation (assumed property lines)
   Location of specific tanks, water lines and sewer lines
   Flood hazard areas, flood zones, and design flood elevations

2. Occupancy group and special occupancy requirements shall be determined.
3. Minimum type of construction shall be deter- mined (see Table 504.3a).
4. Fire-resistant construction requirements shall include the following components:

   Fire-resistant separations
   Fire-resistant protection for type of construction Protection of openings and penetrations of rated walls
   Fire blocking and draftstopping and calculated fire resistance

5. Fire suppression systems shall include:

   Early warning smoke evacuation systems Schematic fire sprinklers
   Standpipes
   Pre-engineered systems Riser diagram.

6. Life safety systems shall be determined and shall include the following requirements:

   Occupant load and egress capacities Early warning
   Smoke control Stair pressurization Systems schematic

7. Occupancy load/egress requirements shall include:

   Building Area

   Occupancy load Gross
   Net
   Means of egress Exit access
   Exit
   Exit discharge
   Stairs construction/geometry and protection Doors
   Emergency lighting and exit signs Specific occupancy requirements Construction requirements Horizontal exits/exit passageways

8. Structural requirements shall include: Soil conditions/analysis
   Termite protection Design loads
   Wind requirements Building envelope
   Impact resistant coverings or systems Structural calculations (if required) Foundation
   Flood requirements in accordance with Section 1612, including lowest floor elevations, enclosures, flood damage- resistant materials
   Wall systems Floor systems
   Roof systems
   Threshold inspection plan Stair systems

9. Materials shall be reviewed and shall at a mini- mum include the following:

   Wood Steel Aluminum Concrete Plastic Glass
   Masonry
   Gypsum board and plaster Insulating (mechanical) Roofing
   Insulation

10. Accessibility requirements shall include the fol- lowing:

    Site requirements Accessible route Vertical accessibility
    Toilet and bathing facilities Drinking fountains Equipment
    Special occupancy requirements Fair housing requirements

11. Interior requirements shall include the follow- ing:

    Interior finishes (flame spread/smoke development)
    Light and ventilation Sanitation

12. Special systems:

    Elevators Escalators Lifts

13. Swimming pools:

    Barrier requirements Spas
    Wading pools

14. Location and installation details. The specific location and installation details of each fire door, fire damper, ceiling damper and smoke damper shall be shown and properly identified on the building plans by the designer.

107.3.5.1.2 Electrical:

~~Electrical:~~

Wiring Services
Feeders and branch circuits Overcurrent protection Grounding
Wiring methods and materials GFCIs

Equipment
Special occupancies
Emergency systems
Communication systems
Low voltage
Load calculations
Design flood elevation

107.3.5.1.3 Plumbing:

Minimum plumbing facilities
Fixture requirements
Water supply piping
Sanitary drainage
Water heaters
Vents
Roof drainage
Back flow prevention
Irrigation
Location of water supply line
Grease traps
Environmental requirements
Plumbing riser
Design flood elevation

107.3.5.1.4 Mechanical:

Energy calculations

Exhaust systems: Clothes dryer exhaust
    Kitchen equipment exhaust
    Specialty exhaust systems

Equipment
Equipment location
Make-up air

Roof-mounted equipment
Duct systems
Ventilation
Combustion air
Chimneys, fireplaces and vents
Appliances
Boilers
Refrigeration
Bathroom ventilation
Laboratory
Design flood elevation

107.3.5.1.5 Gas:

Gas piping
Venting
Combustion air
Chimneys and vents
Appliances
Type of gas
Fireplaces
LP tank location
Riser diagram/shutoffs
Design flood elevation

107.3.5.2 Demolition:

Asbestos removal

107.3.5.3 Residential (one- and two-family):

Site requirements:

Set back/separation (assumed property lines) Location of septic tanks
Building Area
Fire-resistant construction (if required)
Fire
Smoke detector locations

Egress:

Egress window size and location stairs construction requirements

Structural requirements shall include:

Wall section from foundation through roof, including assembly and materials connector tables wind requirements structural calculations (if required)
Flood hazard areas, flood zones, design flood elevations, lowest floor elevations, enclosures, equipment, and flood damage- resistant materials

Accessibility requirements: Show/identify
Accessible bath

Impact resistant coverings or systems

107.3.5.4 Exemptions:

Plans examination by the building official shall not be required for the following work:

Replacing existing equipment such as mechanical units, water heaters, etc.
Reroofs
Minor electrical, plumbing and mechanical repairs
Annual maintenance permits
Prototype plans:

Except for local site adaptions, siding, foundations and/or modifications.
Except for structures that require waiver.

CA12098Text Modification

Manufactured buildings plan except for foundations and modifications of buildings on site.

Mod_12098_Text_107.3.5.pdf Page: 4

TAC: Code Administration

Total Mods for **Code Administration** in **Denied : 7**

Total Mods for report: 7

Sub Code: Building

6

CA12205

Date Submitted	02/17/2025	**Section**	105.3.1.2	**Proponent**	Shannon Few
Chapter	1	**Affects HVHZ**	No	**Attachments**	Yes
TAC Recommendation	Denied				
Commission Action	Pending Review				

Comments

General Comments Yes **Alternate Language No**

Related Modifications

There are no related modifications.

Summary of Modification

Proposing to change the dollar amount in section 4 from $5,000 to $15,000.

Rationale

The $5,000 amount was put into effect in the early 1980's and our proposal to increase to $15,000 reflects the impact of inflation since adoption.

Fiscal Impact Statement

Impact to local entity relative to enforcement of code

There is no impact to enforcement of code.

Impact to building and property owners relative to cost of compliance with code

It will decrease the cost to the property owners as projects under $15,000 will no longer need the sign and seal from an engineer.

Impact to industry relative to the cost of compliance with code

It is a cost saving measure that will simplify the process on these smaller projects.

Impact to small business relative to the cost of compliance with code

It will decrease the cost to the business owners as projects under $15,000 will no longer need the sign and seal from an engineer.

Requirements

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

There is no negative impact to the health, safety, and welfare of the general public.

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

We are not proposing any changes related to products, methos or systems of construction.

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

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

Does not degrade the effectiveness of the code

The change does not degrade the effectiveness of the code.

2nd Comment Period

CA12205-G1

Proponent Shannon Few Submitted 8/3/2025 2:56:26 PM Attachments No

Comment:

I am writing as Executive Director of the Integration Association of Florida on behalf of our 475+ members in support of this proposed modification to the Florida Building Code regarding the threshold for documents requiring engineering sign and seal. Specifically, we support increasing the cost threshold from $5,000 to $15,000 for systems such as fire detection and alarm systems in new buildings or additions. The current $5,000 threshold was established in the early 1980s and has not been adjusted to reflect inflation or current economic conditions. Updating this figure to $15,000 simply aligns the threshold with today's construction costs and maintains the intent of the original rule. This change presents several clear benefits: • Cost Savings for Property and Business Owners: Projects under $15,000 would no longer require engineering sign and seal, significantly reducing permitting and design costs for smaller-scale installations. • No Impact to Code Enforcement: The proposed change does not affect how code is enforced or reduce oversight by authorities having jurisdiction. • No Risk to Public Health, Safety, or Welfare: The proposed revision maintains the same safeguards for larger and more complex systems while easing requirements for minor or routine projects. It does not degrade the effectiveness of the Florida Building Code. • Improved Efficiency: Simplifying the process for small-scale work helps reduce delays and administrative burdens for both contractors and regulatory agencies. In summary, this is a practical, inflation-adjusted update that supports cost-effective compliance without compromising safety. I respectfully request the Commission to approve this change.

2nd Comment Period

CA12205-G2

Proponent Michael Sudheimer Submitted 8/4/2025 9:05:21 AM Attachments No

Comment:

Updating the $5000 sign and seal threshold in the Florida Building Code involves both economic and professional practice considerations. Below are several key reasons to support a proposal for updating this threshold. $5,000 in the 1990s (when the threshold was originally established) is not equivalent to $5,000 today. Modified for Inflation-adjusted, $5,000 in 1995 equals about $10,000–$12,000+ in 2025 dollars. Most construction materials and labor costs have more than doubled since the threshold was set. The threshold no longer reflects the real value or risk associated with today's construction activities. Raise the threshold from $5,000 to $15,000–$20,000, possibly with categorical exemptions (e.g., non-structural interior alterations). Include periodic reviews every 5 years based on inflation cost data. Requiring a licensed design professional's sign and seal for minor renovations or repairs (e.g., replacing fire alarm system,) adds unnecessary cost and delays to small projects. Raising the threshold would reduce administrative burden on: local business owners, Small contractors, & Local building departments.

2nd Comment Period

CA12205-G3

Proponent Nathan Aydelette Submitted 8/4/2025 9:38:48 AM Attachments No

Comment:

The language for a specific dollar amount is antiquated and doesn't have automatic increases for the cost of inflation. In the 1980s, one could perform repairs, small alterations and small projects under the $5,000.00 ceiling. Today, we can rarely purchase material for $5,000.00 for any of the aforementioned services. This puts unnecessary financial stress on the building owner(s). For example, an apartment complex has a lightning strike and the fire alarm control panel is damaged. The property is placed on fire watch by the local AHJ. In lieu of pulling an expedited permit to perform the panel replacement, one has to create shop drawings and submit to a PE for approval and sealing. This process takes weeks to complete. Meanwhile, the property owner is spending $6,000 - $7,000.00 a day for fire watch. As one can see, it isn't just the cost sealing drawings. It is the cost of the overall process. Our sister industry, fire sprinkler association, had their language change to a quantity of devices, 299. This saves time in the future for having to readdress the requested dollar amount of $15,000.00 as it relates to ongoing inflation. In summary, the $15,000 will suffice for the next several years, and maybe a decade, but we will be returning to this issue again. Lets collectively solve this issue for today and the future. Nathan Aydelette Nicet IV National Institute for Certification of Engineering Technologies A Division of National Society of Professional Engineers

2nd Comment Period

CA12205-G4

Proponent Collins Jeff Submitted 8/4/2025 9:48:48 AM Attachments No

Comment:

Please do not modify the amount for fire alarm systems based on the fact these systems are critical life safety components to the visitors and occupants of buildings where installed. These types of systems provide property protection and life safety by offering early warning and notification to emergency services personnel and the occupants of the building. These systems are also utilized to monitor fire sprinkler systems and need to be reviewed by a professional engineer specializing in these types of installations.

2nd Comment Period

CA12205-G5

Proponent Norman Messer Submitted 8/4/2025 10:28:14 AM Attachments No

Comment:

I believe that due to inflation the minimum cost to require an engineer stamp/approval should be raised to $15,000. The current requirement was set in the 1980's and material/labor costs have increased since then.

2nd Comment Period

CA12205-G6

Proponent Edward Greer Submitted 8/8/2025 6:14:54 PM Attachments No

Comment:

The request change to the limit of 15K allows for customeras to have a Fire alarm contractor to quote a small system install. Where in the 1980's a the 5K allowed for a small system, now that same small system i.e. Sprinkler monitoring system for example now costs the customer w/ the plan review PE stamp and permits about 12K. by changing the limit to 15K it would allow those of us (EF & EC;s) to save the customer both money and time to get a system permitted and installed w/o having to have a PE review. Although Florida Has nor recognized NICET certification, many states allow a NICET 3 or 4 to design a system and submit for permitting and and install. Please consider changing this lilit at allow the customer who want to build in Florida to be able to afford the construction of their projects

2nd Comment Period

CA12205-G7

Proponent Scott Herron Submitted 8/13/2025 11:57:32 AM Attachments No
Comment:
In support of raising the Florida Building Code threshold for engineering sign-and-seal requirements from $5,000 to $15,000 for fire detection and alarm systems in new buildings or additions. The $5,000 limit, unchanged since its adoption, equals nearly $16,000 in today's dollars. This outdated threshold no longer reflects the cost or risk of smaller projects. Raising it to $15,000 would: -Reduce costs for property owners without compromising safety. -Prevent delays on urgent repairs, such as fire alarm control panel replacements, that now require weeks of engineering review while owners pay thousands per day for fire watch. -Increase efficiency for contractors and building departments. Larger, complex projects would still require engineering oversight, preserving safety and the intent of the code. This is a practical, inflation-adjusted update that supports cost-effective compliance and reflects current construction realities. Respectfully in support of this change.

2nd Comment Period

CA12205-G8

Proponent Kevin Lang Submitted 8/13/2025 1:36:45 PM Attachments No
Comment:
I am IN SUPPORT of this proposed modification to the Florida Building Code regarding the threshold for documents requiring engineering sign and seal. Specifically, we support increasing the cost threshold from $5,000 to $15,000 for systems such as fire detection and alarm systems in new buildings or additions.

2nd Comment Period

CA12205-G9

Proponent Danny Harrod Submitted 8/13/2025 2:03:28 PM Attachments No
Comment:
The $5,000 requirement was established in the early 1980s, when that amount would typically cover all sprinkler monitoring systems and most small- to mid-sized alarm systems. The clear intent was to ensure that systems of at least mid-size received an engineer's review, while smaller, less complex systems were exempt because such oversight provided little added value. Over the past 40 years, inflation has effectively erased that original intent. Today, many routine repairs exceed the $5,000 threshold, as do nearly all sprinkler monitoring installations and small alarm systems. With more than 40 years in the fire protection field, I fully support engineer review for mid-size and larger systems, where it truly enhances safety. However, requiring such review for smaller systems offers no additional life safety benefit beyond the current process of licensed contractor submittals and qualified AHJ review. I respectfully request raising the threshold to $15,000. This change would prevent unnecessary costs for our citizens, avoid delays, and keep the focus on projects where an engineer's review makes a meaningful difference. This change is fair, efficient, and overdue.

2nd Comment Period

CA12205-G10

Proponent Jason Rountree Submitted 8/13/2025 3:21:30 PM Attachments No
Comment:
The current $5,000 threshold for requiring an engineer’s review was set in the early 1980s. At that time, $5,000 typically covered all sprinkler monitoring systems and most small- to mid-sized alarm systems. The original intent was to require engineer review for mid-size and larger systems—where it adds real value—while exempting smaller, less complex systems. Over the last 40 years, inflation has erased that balance. Today: • Many routine repairs exceed $5,000. • Nearly all sprinkler monitoring installations and small alarm systems now meet or exceed the threshold. As a result, the requirement now captures projects that are small in scope and low in complexity—offering no additional life safety benefit beyond the current process of licensed contractor submittals and AHJ review. With over four decades in the fire protection field, I strongly support engineer review for projects where it improves safety. However, applying it to minor projects increases costs for citizens, delays timelines, and diverts focus from higher-risk systems. Recommendation: Raise the threshold to $15,000. This update will: • Restore the original intent of the rule. • Reduce unnecessary costs and delays. • Keep engineer review focused on projects where it makes a meaningful difference. This change is practical, fair, and long overdue

2nd Comment Period

CA12205-G11

Proponent Jason Rountree Submitted 8/13/2025 3:22:31 PM Attachments No
Comment:
The current $5,000 threshold for requiring an engineer’s review was set in the early 1980s. At that time, $5,000 typically covered all sprinkler monitoring systems and most small- to mid-sized alarm systems. The original intent was to require engineer review for mid-size and larger systems—where it adds real value—while exempting smaller, less complex systems. Over the last 40 years, inflation has erased that balance. Today: • Many routine repairs exceed $5,000. • Nearly all sprinkler monitoring installations and small alarm systems now meet or exceed the threshold. As a result, the requirement now captures projects that are small in scope and low in complexity—offering no additional life safety benefit beyond the current process of licensed contractor submittals and AHJ review. With over four decades in the fire protection field, I strongly support engineer review for projects where it improves safety. However, applying it to minor projects increases costs for citizens, delays timelines, and diverts focus from higher-risk systems. Recommendation: Raise the threshold to $15,000. This update will: • Restore the original intent of the rule. • Reduce unnecessary costs and delays. • Keep engineer review focused on projects where it makes a meaningful difference. This change is practical, fair, and long overdue

2nd Comment Period

CA12205-G12

Proponent Shaine Bravo Submitted 8/14/2025 7:49:39 AM Attachments Yes
Comment:
I strongly support the proposed change to raise the engineering threshold cost from $5K to $15K. This adjustment is not only practical but essential for keeping pace with the scale and complexity of our current operations. This adjustment is long overdue, considering the cumulative inflation from (1980-2025) this alone makes the $5K threshold outdated and reflects a 1980s economy, not today’s cost structure. For example, when comparing job costs for fire alarm industry, several factors come into play: skilled labor rates have significantly increased, material costs have doubled their cost over the past decade, complexity of installation, inspection/testing requirements. The evolving scale and complexity of our projects and industry advancements from conventional to addressable systems and integration with other safety systems pushes costs even higher. HB 551 recently passed mandating “Fire alarm system project" to streamline a simplified permitting process to be executed more efficiently for small-scale infrastructure enhancements that require system modifications, including panel replacements using the same make and model. This bill recognizes that minor site upgrades and improvements the $5K threshold should not trigger unnecessary full engineering and limit excessive documentation which is why increasing the threshold will empower teams to move more efficiently, reduce unnecessary administrative overhead, and focus engineering resources on initiatives that truly require their expertise. It’s a practical step that aligns with current economic realities and promotes smarter, faster decision-making across the organization.

2nd Comment Period

CA12205-G13

Proponent Raymond Priebe Submitted 8/14/2025 8:55:05 AM Attachments No
Comment:
The current $5,000 threshold for requiring an engineer's review was established in the early 1980s. At that time, $5,000 typically covered all sprinkler monitoring systems and most small- to mid-sized alarm systems. The rule's original purpose was clear—require engineer review for mid-size and larger systems where it adds measurable value, while exempting smaller, less complex installations. Over the last 40 years, inflation has erased that balance. Today: Many routine repairs exceed $5,000. Nearly all sprinkler monitoring installations and small alarm systems now meet or exceed the threshold. As a result, projects that are small in scope and low in complexity are now subject to the same review as major installations—without providing any additional life safety benefit beyond the existing licensed contractor submittals and AHJ review. With over four decades in the fire protection field, I strongly support engineer review where it genuinely improves safety. However, applying it to minor projects adds unnecessary cost to citizens, delays timelines, and diverts resources from higher-risk systems that deserve closer scrutiny. Recommendation: Increase the threshold to $15,000. This update would: Restore the original intent of the rule. Reduce avoidable costs and project delays. Keep engineer review targeted where it makes the most difference for safety. This change is practical, fair, and long overdue.

2nd Comment Period

CA12205-G14

Proponent Douglas Wojcik Submitted 8/14/2025 10:02:08 AM Attachments No
Comment:
The $5000 project figure is antiquated, and represents an unreasonable bar in todays marketplace, where even repairs to existing systems can approach and exceed this engineering threshold. A $5000 valuation from 1983, translated to 2025 dollars using CPI calculations results in a value over $16,500. Raising the threshold back to this level restores the original intent of the legislation, which IS still appropriate.

2nd Comment Period

CA12205-G15

Proponent Eric Tysinger Submitted 8/18/2025 10:29:48 AM Attachments No
Comment:
The $5,000 requirement was established in excess of 30 years ago in the 80s, when that amount would typically cover all sprinkler monitoring systems and most small- to mid-sized alarm systems. The clear intent was to ensure that systems of at least mid-size received an engineer's review, while smaller, less complex systems were exempt because such oversight provided little added value. Since that time, inflation has effectively erased that original intent. Today, most routine repairs exceed the $5,000 threshold, as do nearly all sprinkler monitoring installations and basic alarm systems. In the past 8-10 years I cannot recall seeing any fire alarm projects fall under that threshold. As this reequipment is currently written, it practically forces engineer involvement into all fire alarm projects regardless of size. This just increases unnecessary cost and additional time to all aspects of the project. I fully support engineer review for mid-size and larger systems, where it truly enhances safety. However, requiring such review for smaller systems offers no additional life safety benefit beyond the current process of licensed contractor submittals and qualified AHJ review. I respectfully request raising the threshold to $15,000. This change would prevent unnecessary costs for our citizens, avoid delays, and keep the focus on projects where an engineer's review makes a meaningful difference. This change is fair, efficient, and overdue.

2nd Comment Period

CA12205-G16

Proponent Adam Martin Submitted 8/20/2025 12:01:33 PM Attachments No

Comment:

The $5,000 threshold was originally set in the early 1980s, when that amount typically covered most small- to mid-sized alarm systems. The intent was to ensure that systems of at least moderate complexity received an engineer's review, while simpler, lower-cost systems were exempt, as such oversight was considered unnecessary. Today, however, many routine repairs alone can exceed the $5,000 mark, making the original threshold less reflective of current industry costs.

2nd Comment Period

CA12205-G17

Proponent John Prince Submitted 8/20/2025 12:04:56 PM Attachments No

Comment:

The $5,000 requirement was established in the early 1980s, when that amount would typically cover all sprinkler monitoring systems and most small- to mid-sized alarm systems. The clear intent was to ensure that systems of at least mid-size received an engineer's review, while smaller, less complex systems were exempt because such oversight provided little added value. Over the past 40 years, inflation has effectively erased that original intent. Today, many routine repairs exceed the $5,000 threshold, as do nearly all sprinkler monitoring installations and small alarm systems. With more than 20 years in the alarm industry, I fully support engineer review for mid-size and larger systems, where it truly enhances safety. However, requiring such review for smaller systems offers no additional life safety benefit beyond the current process of licensed contractor submittals and qualified AHJ review. I respectfully request raising the threshold to $15,000. This change would prevent unnecessary costs for our citizens, avoid delays, and keep the focus on projects where an engineer's review makes a meaningful difference. This change is fair, efficient, and overdue.

2nd Comment Period

CA12205-G18

Proponent Jacob Foster Submitted 8/20/2025 12:44:23 PM Attachments No

Comment:

In favor of raising price to $15,000.00. Jobs under 5k are almost non existent now. This practice was implemented in the 80's and the value of money has gone down yet the price for this has not changed.

2nd Comment Period

CA12205-G19

Proponent Bert Wynne Submitted 8/20/2025 1:06:40 PM Attachments No

Comment:

The $5,000 threshold for engineer reviews, established in the early 1980s for mid-sized fire protection and alarm systems, is now outdated due to inflation. This means many smaller projects now unnecessarily require costly reviews that offer no additional safety benefits beyond the current submittal process and qualified authority having jurisdiction reviews. I am requesting the threshold be increased to $15,000 to ensure engineer oversight focuses on projects where it truly enhances safety, avoiding unnecessary expenses and delays for smaller systems.

2nd Comment Period

CA12205-G20

Proponent Joshua Pfeiffer Submitted 8/20/2025 1:15:24 PM Attachments No

Comment:

Most routine repairs exceed the $5,000.00 threshold. Threshold needs to be increased in order to prevent unnecessary costs for Florida citizens, avoid delays, etc.

2nd Comment Period

CA12205-G21

Proponent Jeffrey Gates Submitted 8/20/2025 1:16:15 PM Attachments No

Comment:

The original requirement, established over 40 years ago, is no longer applicable to our industry today. Most basic fire sprinkler monitor system install today are costing above $7-8k to monitor a single wet system and should hardly require an engineer's review or drawings. I fully support raising this threshold to $15k to become concurrent with today's cost of labor and materials for installing alarm systems below the mid-sized range and larger. This change would prevent unnecessary costs on both the contractor and AHJ sides of the table, reducing delays and passing on that savings to the taxpaying citizens. Please consider bringing this long-overdue change into effect.

2nd Comment Period

CA12205-G22

Proponent Lawrence Boraiko Submitted 8/20/2025 2:55:08 PM Attachments Yes

Comment:

Fire Alarm threshold for engineering sign and seal needs revision

2nd Comment Period

CA12205-G23

Proponent Jeffrey Gates Submitted 8/20/2025 3:18:12 PM Attachments No

Comment:

Please consider changing the minimum from $5k to $15k for engineer's review and signature as this existing minimum no longer reflects the real costs of installation in the industry. A typical fire sprinkler monitor system for a single wet riser is typically in excess of $7k, and even a small fire alarm system with less than 20 devices can no fall in the range of $10k+ given inflation, the cost of materials and permitting fees. It is also a burden on the contractor, the AHJ, and the taxpayer that has those costs passed on to them. This change will help reduce time and streamline the installation of systems that are easily considered to fall into the small to mid-range size and should no longer require the time and effort required by this out dated Code.

2nd Comment Period

CA12205-G24

Proponent Debra Rountree Submitted 8/21/2025 9:23:54 AM Attachments No

Comment:

The $5,000 threshold for requiring engineer review was set in the early 1980s, but inflation has made it outdated. Today, even small repairs and basic sprinkler monitoring jobs exceed $5,000, forcing engineer review where it adds no real safety benefit. Raising the limit to $15,000 would restore the rule’s original intent, cut unnecessary costs and delays, and keep engineers focused on larger, higher-risk systems where their review truly makes a difference.

2nd Comment Period

CA12205-G25

Proponent Shannon Few Submitted 8/21/2025 9:52:44 AM Attachments No

Comment:

I am in support of this proposed modification to the Florida Building Code regarding the threshold for documents requiring engineering sign and seal. Specifically, I support increasing the cost threshold from $5,000 to $15,000 for systems such as fire detection and alarm systems in new buildings or additions. The current $5,000 threshold was established decades ago and has not been adjusted to reflect inflation or current economic conditions thus negating the purpose and original intent for establishing a threshold. Updating this figure to $15,000 simply aligns the threshold with today's construction costs and maintains the intent of the original rule. This change presents several clear benefits: • Cost Savings for Property and Business Owners: Projects under $15,000 would no longer require engineering sign and seal, significantly reducing permitting and design costs for smaller-scale installations. • No Impact to Code Enforcement: The proposed change does not affect how code is enforced or reduce oversight by authorities having jurisdiction. • No Risk to Public Health, Safety, or Welfare: The proposed revision maintains the same safeguards for larger and more complex systems while easing requirements for minor or routine projects. It does not degrade the effectiveness of the Florida Building Code. • Improved Efficiency: Simplifying the process for small-scale work helps reduce delays and administrative burdens for both contractors and regulatory agencies. In summary, this is a practical, inflation-adjusted update that supports cost-effective compliance without compromising safety. I respectfully request the Commission to approve this change. I respectfully urge you to reconsider the denial of this code modification and accept the proposal to improve efficiency and reduce the cost burden on consumers. Kind Regards, Shannon Few

2nd Comment Period

CA12205-G26

Proponent Nicole Roberts Submitted 8/21/2025 10:27:20 AM Attachments No

Comment:

Raising the requirement for a digit signature from $5,000 to $15,000 is necessary due to raised product costs.

2nd Comment Period

CA12205-G27

Proponent James Sangster Submitted 8/21/2025 10:34:19 AM Attachments No

Comment:

I think raising the dollar amount doesn't make a difference to systems that are requiring an engineer survey. System that deal in oxygen, gas, water, etc. These systems need to have an engineer stamp. However, non-complex fire alarm systems that does not hinder the safety of people or property, I'm ok with raising the cost threshold to $15k for these materials have gone up and needs a quick turnaround.

2nd Comment Period

CA12205-G28

Proponent Charles Kraus Submitted 8/21/2025 11:32:05 AM Attachments No

Comment:

The $5,000 threshold for requiring an engineer's review was set in the early 1980s, when it covered most small- to mid-sized fire protection systems. The intent was to review mid-size and larger projects—where it adds real value—while exempting smaller, simpler ones. Today, inflation means most routine repairs and small installations now exceed $5,000, pulling minor projects into the process without improving safety. This adds cost and delays for owners while shifting attention away from higher-risk systems. Recommendation: Raise the threshold to $15,000. Adjusted for inflation, the original $5,000 would be about $19,550 today. Updating the threshold will restore the rule's intent, reduce unnecessary costs, and keep engineer review focused where it makes the greatest impact.

2nd Comment Period

CA12205-G29

Proponent William Behringer Submitted 8/21/2025 11:58:01 AM Attachments No

Comment:

This adjustment in the Engineering requirement is long overdue as the fire sprinkler industry already had a major adjustment in raising the minimum requirements for the required engineering threshold. Basic new systems exceed the present $5000.00 threshold; it should be raised to the proposed $15,000.00

2nd Comment Period

CA12205-G30

Proponent James Stephens Submitted 8/21/2025 1:00:49 PM Attachments No

Comment:

This modification will do wonders on saving money for end users that don't have big systems.

2nd Comment Period

CA12205-G31

Proponent Jonathan Kraft Submitted 8/21/2025 1:18:51 PM Attachments No

Comment:

I am writing to respectfully propose an update to the current threshold for requiring an engineer’s review of fire protection systems. The existing $5,000 limit was established in the early 1980s, when that amount typically covered the cost of sprinkler monitoring systems and most small- to mid-sized fire alarm systems. The intent behind this threshold was to ensure that systems of moderate complexity received appropriate engineering oversight, while smaller, less complex systems were exempt due to the limited value such review would provide. However, over the past four decades, inflation and rising material and labor costs have significantly eroded the effectiveness of this threshold. Today, many routine repairs and basic system installations exceed $5,000, including nearly all sprinkler monitoring systems and small alarm systems. As a result, the threshold no longer reflects the scale or complexity of the systems it was designed to regulate, and it inadvertently imposes unnecessary costs and delays on projects that do not benefit from additional engineering oversight. With years of experience in the fire protection industry, I fully support the requirement for engineer review on mid-sized and larger systems, where such oversight meaningfully contributes to life safety and system integrity. However, for smaller systems, the current process—consisting of submittals by licensed contractors and review by qualified Authorities Having Jurisdiction (AHJs)—already provides sufficient safeguards. Requiring engineer review for these systems adds administrative burden without enhancing safety outcomes. Proposal Details: Recommended Threshold Increase: Raise the engineer review requirement from $5,000 to $15,000. Rationale: Reflects inflation and current market costs Aligns regulatory oversight with system complexity Reduces unnecessary expenses for property owners and developers Prevents delays in permitting and installation Maintains focus on projects where engineering input provides tangible safety benefits Expected Benefits: More efficient use of engineering resources Streamlined approval processes for small-scale projects Continued assurance of life safety through existing contractor and AHJ review mechanisms This proposed change is fair, efficient, and long overdue. It would modernize the regulatory framework to better reflect today’s economic realities while preserving the original intent of ensuring safety through appropriate oversight. I appreciate your consideration of this proposal and welcome the opportunity to discuss it further or provide additional supporting documentation. Sincerely, Jonathan R. Kraft

2nd Comment Period

CA12205-G32

Proponent Joseph Cline Submitted 8/21/2025 2:05:26 PM Attachments No
Comment:
The $5000 rule was set back in the early 80s when that amount covered most alarm and sprinkler jobs. It was meant for mid size and larger systems where an engineer’s review actually added value, not for small simple projects. Fast forward 40 years and $5000 does not go far anymore. Routine repairs and even small monitoring installs reach that mark, which means reviews are being required for jobs that do not benefit from them. It just adds cost, slows projects down, and pulls focus from the bigger higher risk systems. Raising the threshold to $15000 would fix that. It keeps engineer review where it matters, saves time and money on the smaller jobs, and brings the rule back in line with its original intent.

2nd Comment Period

CA12205-G33

Proponent Jason Kirk Submitted 8/21/2025 2:21:37 PM Attachments No
Comment:
The $5,000 requirement was established in the early 1980s to cover sprinkler monitoring systems and small to mid-sized alarm systems. This was a significant step forward in ensuring that life safety remained a priority while allowing engineers to concentrate on more complex systems. The focus was on life safety rather than processes. As we all know, the cost of living has risen over the last five years. This makes the need for an increase even more important, especially since the requirement has not been updated since the 1980s. We made considerable progress back then, and it is certainly time to make a similar advancement now. I propose that we raise this requirement from $5,000 to $15,000 to maintain our forward momentum. This will reduce downtime for routine repairs, ensuring that life safety components are repaired, installed and functional promptly. This will also lighten the burden on our building departments, engineers, and owners.

2nd Comment Period

CA12205-G34

Proponent Raleigh Smith Submitted 8/21/2025 2:30:32 PM Attachments No
Comment:
We respectfully request that this requirement be re-evaluated and updated to reflect current industry realities. We would welcome the opportunity to provide further information, industry data, or participate in discussions to help shape a more effective and practical standard. This regulation adds unnecessary expense and administrative burden to projects, impacting businesses, property owners, and contractors alike. Modernizing the rule would help streamline processes, lower costs, and allow licensed contractors to operate more efficiently while still maintaining the highest levels of safety and compliance.

2nd Comment Period

CA12205-G35

Proponent Douglas Crawford Submitted 8/21/2025 2:55:35 PM Attachments No
Comment:
Regarding the current 'sign and seal requirement' for specialized mechanical, electrical, or plumbing documents, the existing 5k threshold is outdated due to inflationary factors that have accrued since this threshold was established. As a minimum, the threshold should be raised by at least 10k+ (=$15,000), which would increase industry efficiencies, help to promote compliance, and also reduce cost and unnecessary processing for end-users. This modification would still uphold the intent and effectiveness of the code, while also increasing engineering capacity (availability) for the specialized installations and modifications that require engineering oversight and verification the most.

2nd Comment Period

CA12205-G36

Proponent Ken Mock Submitted 8/21/2025 3:25:14 PM Attachments No

Comment:

As a Branch Manager for a life safety company, I frequently see small repairs escalate in cost unnecessarily due to the $5,000 sign-and-seal requirement. In many cases, that amount is already spent on materials before we even arrive on site. The threshold no longer reflects the realities of today's market, and an increase is long overdue to better serve customers and streamline operations.

2nd Comment Period

CA12205-G37

Proponent Frank Richey Submitted 8/21/2025 3:25:45 PM Attachments No

Comment:

The current $5,000 threshold for requiring an engineer's review was originally meant for mid-size and larger systems where the review adds value. At the time, it covered most sprinkler monitoring systems and many small- to mid-sized alarm systems. Today, many simple repairs and almost all small alarm and sprinkler monitoring systems cost $5,000 or more. This means that even small, low-risk projects now require engineer review—adding extra cost and delays, without improving safety. I fully support engineer review when it improves safety. But using it on small, simple projects takes time and money away from more important, higher-risk systems. Please raise the threshold to $15,000 to: Get back to the original purpose of the rule Avoid extra costs and delays on small jobs Focus engineer review where it really matters This change is sensible, fair, and overdue.

2nd Comment Period

CA12205-G38

Proponent Ken Mock Submitted 8/21/2025 3:30:47 PM Attachments No

Comment:

As a Branch Manager for a life safety company, I frequently see small repairs escalate in cost unnecessarily due to the $5,000 sign-and-seal requirement. In many cases, that amount is already spent on materials before we even arrive on site. The threshold no longer reflects the realities of today's market, and an increase is long overdue to better serve customers and streamline operations.

2nd Comment Period

CA12205-G39

Proponent John Vaughn Submitted 8/22/2025 10:41:08 AM Attachments No

Comment:

I respectfully request that the proposed modification to Chapter 1, Section 105.3.1.2 of the Florida Building Code be reconsidered and approved. Earlier this year, our Legislative Committee submitted a code change request to increase the sign-and-seal requirement threshold for specialized mechanical, electrical, or plumbing documents — including those involving medical gas, oxygen, steam, vacuum, toxic air filtration, halon, or fire detection and alarm systems — from $5,000 to $15,000. The initial denial does not reflect the realities of today's construction environment. The $5,000 threshold was established in the early 1980s and has not been updated since. In today's terms, $5,000 equates to well over $15,000, and both material and labor costs have more than doubled. As such, the current threshold is outdated and no longer represents the true cost or risk of smaller-scale projects. Approving this modification will: Reduce unnecessary expenses for property and business owners by eliminating the need for an engineer's seal on specialized projects valued under $15,000. Provide cost savings and simplify the permitting process for smaller projects, including fire detection and alarm system work. Preserve the effectiveness of the Code while aligning it with current economic conditions and industry practice. For these reasons, I urge the Commission to change the decision from denied to approved and adopt the proposed $15,000 threshold. This adjustment will ensure the Florida Building Code remains effective, practical, and economically reasonable.

2nd Comment Period

CA12205-G40

Proponent Bruce Dressel Submitted 8/22/2025 11:42:07 AM Attachments No
Comment:
I respectfully request the Commission to approve this change. The original rule was implemented in the early 1980s and hasn't been modified since its conception to accommodate for inflationary influences. \In doing so it would decrease the cost to the property and business owners as projects under $15,000 will no longer need the sign and seal from an engineer. Additionally would result in a cost saving measures that will simplify the process on these smaller projects and maintain the effectiveness of the code.

2nd Comment Period

CA12205-G41

Proponent Michelle Hankinson Submitted 8/22/2025 11:48:25 AM Attachments No
Comment:
Back in the early 1980s, $5,000 could get you a brand-new fire alarm system and probably a pretty decent used car. The engineer review threshold made sense then—it was aimed at mid-size and larger fire protection projects, the kind where an engineer's expertise really makes a difference in life safety. Fast-forward 40+ years, and $5,000 doesn't go nearly as far. These days: You can hit the threshold just by replacing a panel and pulling some wire. A simple sprinkler monitoring system can now trigger the same level of review as a six-figure fire alarm installation. And routine repairs—things that barely raise an eyebrow—suddenly require full engineer involvement. The result? We're bogging down small, low-risk projects with extra cost, red tape, and delay, all without improving safety one bit. It's like hiring a structural engineer to hang a picture frame—technically possible, but probably not the best use of anyone's time (or money). Don't get me wrong: I'm a big believer in engineer reviews where they add real value. But we've gone from smart oversight to overkill. It's time to bring the threshold into the present day, adjust for inflation, and refocus engineer reviews where they belong—on the big stuff. Let's keep the public safe and keep our sanity.

2nd Comment Period

CA12205-G42

Proponent Sam Tompkins Submitted 8/22/2025 11:59:36 AM Attachments No
Comment:
The proposed increase in the project cost threshold for requiring a P.E. Stamp from $5,000 to $15,000 is a sensible update that has been long overdue. The original $5,000 limit was established in the 1980s and does not account for inflation or other factors influencing project costs, such as tariffs and increased regulatory requirements. Adjusting the threshold for inflation alone would suggest a new limit exceeding $20,000. Therefore, setting the limit at $15,000 is both reasonable and pragmatic. Requiring contractors to obtain a P.E. stamp for smaller projects continues to impose unnecessary costs on both contractors and consumers without enhancing the code's effectiveness. Increasing the threshold to $15,000 will not compromise safety or compliance but will result in significant cost savings and greater procedural efficiency.

2nd Comment Period

CA12205-G43

Proponent Bart Hill Submitted 8/22/2025 12:35:16 PM Attachments No
Comment:
Fire alarm permit applications to the AHJ require all the relevant elements of NFPA, Florida Building Code, and FFPC to be incorporated in the plans and submittals with references, data sheets, and calculations verified by the contractor and AHJ. Only work involving complex systems installation or unusual circumstances are needed to be reviewed by an engineer. Upon submittal, the AHJ could flag an application for engineering review if he/she believed it is warranted in a given situation. Otherwise, submittals are well within the scope of the certified fire alarm contractor.

2nd Comment Period

CA12205-G44

Proponent Jeffrey Garland Submitted 8/22/2025 3:15:51 PM Attachments No

Comment:

This cost of $5,000 is ridiculous. We are forced to pay an engineer on the most basic fire alarm installation, yet, we as the license holder take all the risk. The $15,000 amount is much more acceptable. Thank you

2nd Comment Period

CA12205-G45

Proponent Chuck Patrick Submitted 8/22/2025 3:46:24 PM Attachments No

Comment:

The original $5,000 amount would cover all sprinkler monitoring systems and most small- to mid-sized alarm systems. The intent was to ensure that systems mid-sized to large scale received an engineer’s review, allowing smaller, less complex systems to be processed by licensed contractors and qualified AHJs. Over the years, inflation has affected the original intent. Today, many routine repairs exceed the $5,000 threshold, as do nearly all sprinkler monitoring installations and small alarm systems. I fully support engineer review for mid-size and larger systems to ensure our life safety systems are adequate and code compliant. However, requiring such review for smaller systems only adds unnecessary costs for our citizens and owners, additionally an inefficient process for AHJ's, owners and licensed contractors. I respectfully request raising the threshold to $15,000. This is a change overdue, efficient, fair, and is only updating the original intent with today's environment. Thank you in advance.

2nd Comment Period

CA12205-G46

Proponent Chris Powles Submitted 8/22/2025 3:55:56 PM Attachments No

Comment:

In this current state of inflated pricing due to tariffs on ALL FIRE alarm equipment the most minute project of change (which would fall under within the existing less than 25 points new permitting system) could still require the plans to be S&S due to the price being around $5K or over. The implimintation of this requirement being raised to $15K would be a great value and would get a lot of intended work to be approved by customer that are putting off small upgrades due to the S&S engineering fees.

2nd Comment Period

CA12205-G47

Proponent GUY TORI Submitted 8/22/2025 4:18:24 PM Attachments No

Comment:

Please raise from $5k to $15k to be more in line with today's prices rather than the 80's.

2nd Comment Period

CA12205-G48

Proponent Thomas Allen Submitted 8/22/2025 4:45:39 PM Attachments No

Comment:

The $5,000 amount was put into effect in the early 1980's and the proposal to increase to $15,000 reflects the impact of inflation since adoption. This change will reduce expenses for customers and contractors and will assist in more efficient permit processing, as small projects will be able to move through permitting without signed and sealed design.

2nd Comment Period

CA12205-G49

Proponent Tommy Demopoulos Submitted 8/23/2025 11:31:06 AM Attachments No

Comment:

This modification to adjust the dollar amount from $5,000 to $15,000 makes sense with inflation for equipment and labor. This will save time for jobs and costs for stakeholders. Respectfully reconsider approval of this modification.

2nd Comment Period

CA12205-G50

Proponent Cindi Harrod Submitted 8/23/2025 3:29:24 PM Attachments No

Comment:

I fully support the code improvements as written in the proposed modification. In order to reflect and enforce the original intent of the code written 40+ years ago, inflation needs to be considered.

2nd Comment Period

CA12205-G51

Proponent Diego del Pino Submitted 8/23/2025 7:27:10 PM Attachments No

Comment:

Common sense tells us that is the current $5000 threshold was set in the 1980’s then it must be brought up to the current equivalent of what that amount was in the 80’s to today’s value, I personally think it should be more than $15K but if that’s what others have submitted so be it. COME ON PEOPLE BE REASONABLE!

2nd Comment Period

CA12205-G52

Proponent Jeannene Meisman Submitted 8/23/2025 7:33:22 PM Attachments No

Comment:

I am a Florida licensed Fire Protection Contractor and a former Assistant Fire Chief. I currently work for a large fire protection engineering firm, representing the sales of fire protection engineering services in Florida. The intent of this code was to represent a "median" size of project. Which in the 1980's would have been approximately $5000. Clearly, with inflation and the current cost of parts and pieces of fire alarm systems $5000 is a charge typically associated today with a service call not a "median" installation of equipment which would require the review, stamp and seal or direct oversight of a fire protection engineer. Given 40 years has passed since this dollar amount has been reconsidered, I would recommend that modifying this dollar amount to reflect the proposed $15,000 would be prudent. Keeping the amount at the 1980's dollar figure is adding additional cost to the contractor and building owner and adding time to each project while we await review of simple, basic system work and is an unnecessary burden. From an engineering perspective these small jobs take up an engineer's time when qualified alarm contractors can oversee and execute this work.

2nd Comment Period

CA12205-G53

Proponent PAULO SILVA Submitted 8/24/2025 8:39:12 AM Attachments No

Comment:

I support the proposed modification to increase the threshold for engineer sign and seal from $5,000 to $15,000. This update reflects the current construction environment and cost levels, since the original threshold was established more than 40 years ago. Adjusting the value will: • Reduce unnecessary costs for owners and contractors on smaller projects. • Maintain focus of engineering review where it adds real value to public safety. • Streamline the process without compromising compliance with the Florida Building Code. This is a reasonable and much-needed modernization that will benefit both the industry and the community. Respectfully, Paulo Henrique Fechine Silva Civil Engineer – Fire Protection Specialist

CA12205Text Modification

1. 4.Any specialized mechanical, electrical, or plumbing document for any new building or addition which includes a medical gas, oxygen, steam, vacuum, toxic air filtration, halon, or fire detection and alarm system which costs more than ~~$5,000~~ $15,000.

Page: 1

Mod12205_TextOfModification.pdf

CA12205-G22General Comment

To whom it may concern,

RE: Chapter 1 Section 105.3.1.2 threshold for signing and sealing fire alarm plans.

The $5,000 threshold for signing and sealing fire alarm drawings is outdated and needs to be raised to $15,000. Even a simple panel replacement for lightning damage frequently surpasses the $5,000 threshold and simple sprinkler monitoring systems do as well. The $5,000 threshold is over 40 years old. It may be easy money for me as an engineer, but fire alarm systems under $15,000 in valuation are cookie cutter plans and don't benefit from engineering review, contractor and AHJ review will catch any minor omissions on small projects. They simply add cost and delays to jobs. There is plenty of work out there that can actually benefit from engineering oversight and review, and engineering time would be more efficiently spent on those projects.

Thank you

Lawrence Boraiko FL PE 77101
Wiginton Fire Protection Engineering

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Mod_12205_G22_General_Fire alarm Engineering threshold.pdf

CA12205-G12General Comment

I strongly support the proposed change to raise the engineering threshold cost from $5K to $15K. This adjustment is not only practical but essential for keeping pace with the scale and complexity of our current operations. This adjustment is long overdue, considering the cumulative inflation from (1980-2025) this alone makes the $5K threshold outdated and reflects a 1980s economy, not today's cost structure. For example, when comparing job costs for fire alarm industry, several factors come into play: skilled labor rates have significantly increased, material costs have doubled their cost over the past decade, complexity of installation, inspection/testing requirements. The evolving scale and complexity of our projects and industry advancements from conventional to addressable systems and integration with other safety systems pushes costs even higher.

HB 551 recently passed mandating "Fire alarm system project" to streamline a simplified permitting process to be executed more efficiently for small-scale infrastructure enhancements that require system modifications, including panel replacements using the same make and model. This bill recognizes that minor site upgrades and improvements the $5K threshold should not trigger unnecessary full engineering and limit excessive documentation which is why increasing the threshold will empower teams to move more efficiently, reduce unnecessary administrative overhead, and focus engineering resources on initiatives that truly require their expertise. It's a practical step that aligns with current economic realities and promotes smarter, faster decision-making across the organization.

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Mod_12205_G12_General_Public Comment FBC 105.3.1.2.pdf

TAC: Code Administration

Total Mods for **Code Administration** in **Denied : 7**

Total Mods for report: 7

Sub Code: Building

7

CA12257

Date Submitted	02/17/2025	**Section**	110.3.14	**Proponent**	Cade Booth
Chapter	1	**Affects HVHZ**	No	**Attachments**	Yes
TAC Recommendation	Denied				
Commission Action	Pending Review				

Comments

General Comments Yes **Alternate Language No**

Related Modifications

t601, 602.4, 703.8, 703.9, t705.5, 718.2.1, 722.7, 403.3.2, [F]3314.1, 2301.3, 2304.10.8, 2304.11.1.1, 2304.11.3, 2304.11.4, 1711.1, t1711.1, 1711.2, 110.3.14, 202, t504.3, t504.4, t506.2, 508.4.4.1, 509.4.1.1, 1405.5, 1406.2.1, 1406.3, 3102.3, 3102.6.1.1, D102.2.5, and refs ch 35.

Summary of Modification

The proposed updates the FBC to include mass timber, aligning it with national standards and advancements in building science, fire safety, and structural integrity. Backed by extensive research and testing, this ensures clear enforcement, cost-effective compliance, and statewide consistency.

Rationale

For a comprehensive understanding of the proposed mass timber code modifications, be sure to review the full rationale statement PDF. It includes a summary of mass timber’s history, the benefits of adoption for Florida, the need for action, and key supporting information. You'll also find links to technical resources and documents that provide further validation. Don't miss this essential guide to why mass timber belongs in the Florida Building Code! In summary, as mass timber construction continues to gain traction across the U.S., including within Florida, it is crucial for the Florida Building Code (FBC) to be updated to incorporate provisions for this proven and innovative construction method. With 40 states already adopting mass timber regulations based on the International Building Code (IBC), these proposed modifications align Florida with nationally recognized consensus codes. The changes will provide a clear, standardized framework for enforcement, streamline compliance for building owners and developers, and support greater design flexibility, all while maintaining rigorous fire safety and structural integrity standards. Adopting mass timber into the FBC will also help Florida keep pace with emerging construction technologies, ensuring the state can effectively regulate these advancements without compromising safety or performance.

Fiscal Impact Statement

Impact to local entity relative to enforcement of code

Positive; lowers impact. Including mass timber in the FBC provides a consistent regulatory framework for building and fire code officials. It streamlines enforcement, reduces uncertainty, and improves efficiency in plan reviews

and inspections by ensuring uniform standards across jurisdictions.

Impact to building and property owners relative to cost of compliance with code

Positive; lowers impact. The inclusion of mass timber offers a new construction method that can lower costs for building owners. A consistent regulatory approach statewide simplifies approvals, reduces delays, and allows owners to choose cost-effective materials without uncertainty.

Impact to industry relative to the cost of compliance with code

Positive; neutral or lowers impact. Including mass timber in the FBC gives builders and developers more construction options, increasing competition and potentially lowering costs. Consistent enforcement across the state reduces regulatory uncertainty and streamlines the approval process.

Impact to small business relative to the cost of compliance with code

Positive; lowers impact. Small businesses benefit from a uniform regulatory framework, reducing compliance costs. With mass timber, smaller firms can leverage prefabrication, shorter timelines, and cost savings, leading to more cost-effective projects and new business opportunities.

Requirements

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

Yes. Mass timber has been thoroughly tested for structural integrity and fire performance, proving its safety and durability. Its inclusion in the Florida Building Code ensures consistent regulation statewide, reducing uncertainty for officials and enhancing safety through uniform enforcement.

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

Yes, strengthens and improves FBC. Mass timber, included in national codes since 2021, is supported by comprehensive research and testing. It offers a durable, fire-safe alternative that expands construction options without compromising safety, strengthening the code with new, tested materials.

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

No discrimination and aligns with national standards since its 2021 IBC inclusion. Adopted in 40 states, with 6 more in process, mass timber is not replacing existing methods but adds a tested, proven option, ensuring fairness in material selection without preference or restriction.

Does not degrade the effectiveness of the code

Adopting mass timber strengthens the FBC by adding structural and fire safety criteria validated by testing and research from the ICC TWB. It doesn't alter or weaken requirements for other construction types but ensures consistent enforcement of tested, nationally accepted standards.

2nd Comment Period

CA12257-G1

Proponent Cade Booth Submitted 8/22/2025 3:32:38 PM Attachments No

Comment:

As promised, the AWC has offered and provided direct training to TAC members and engaged in multiple discussions to help resolve outstanding concerns. We look forward to continuing the conversation on the mass timber provisions at the second TAC meetings. The primary objection raised by this TAC was that other TACs had not yet decided on including Mass Timber in the FBC. However, the decisions or order of other TACs do not affect this TAC's responsibility to consider the proposed. This modification simply asks the TAC to determine whether, if Mass Timber is included in the code, should their connections be inspected. Mo Madani has clarified that any inconsistencies between TAC decisions will handled by staff, so if Mass Timber is not adopted, this section would likely not go forward. The only question before this TAC at this time is whether Mass Timber connections should be subject to inspection if it becomes part of the code. We respectfully request your approval as we believe this inspection to be important.

CA12257Text Modification

CHAPTER 1

SCOPE AND ADMINISTRATION

SECTION 110

INSPECTIONS

Add new section as follows:

110.3.14 Types IV-A, IV-B, and IV-C connection protection inspection. In buildings of Types IV-A, IV-B, and IV-C construction, where connection fire-resistance ratings are provided by wood cover calculated to meet the requirements of Section 2304.10.8, inspection of the wood cover shall be made after the cover is installed, but before any other coverings or finishes are installed.

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Mod12257_TextOfModification.pdf

FBC 9th edition – Mass Timber Package

Th following document is a comprehensive package of all code modifications related to mass timber proposals. It is provided for your reference as it is essential these proposals be able to be reviewed in context rather than in isolation, as the adoption of new construction types – Type IV-A, IV-B, and IV-C – has broad implications throughout the Florida Building Code. Having context of these provisions together ensures a clear understanding of their interconnections, facilitating informed decision-making regarding the integration of mass timber construction into the code.

The proposed modifications to the Florida Building Code have been organized in a presentation sequence for logic rather than strictly following the order of the code. This approach ensures that the rationale for mass timber construction is presented clearly, allowing stakeholders to understand the technical justification before diving into specific code provisions. This proposal package first establishes the construction types themselves – Types IV-A, IV-B, IV-C – to provide a foundational understanding. It then transitions into details of fire protection, followed by specific provisions necessary to integrate mass timber into the code. Finally, it addresses additional supporting provisions, including inspections, allowable heights and areas, and distinctions where existing code is applicable to the existing Type IV-HT only. The sequence is intended to provide a comprehensive package for consideration and refence for the inclusion of mass timber in the Florida Building Code, 9th edition.

A Table of Contents (in order of appearance in the package) and Index (in order of section reference) have been provided for reference.

Thank you.

TABLE OF CONTENTS

INDEX - IN ORDER OF SECTION REFERENCE

FBC 9th edition – Mass Timber Package

CHAPTER 6
TYPES OF CONSTRUCTION

SECTION 601
GENERAL

Revise table as follows:

TABLE 601
FIRE-RESISTANCE RATING REQUIREMENTS FOR BUILDING ELEMENTS (HOURS)

BUILDING ELEMENT	TYPE I		TYPE II		TYPE III		TYPE IV				TYPE V	
	A	B	A	B	A	B	A	B	C	HT	A	B
Primary structural frame[f] (see Section 202)	3[a, b]	2[a,b,c]	1[b, c]	0[c]	1[b, c]	0	3[a]	2[a]	2[a]	HT	1	0
Bearing walls												
Exterior[e, f]	3	2	1	0	2	2	3	2	2	2	1	0
Interior	3[a]	2[a]	1	0	1	0	3	2	2	1/HT[g]	1	0
Nonbearing walls and partitions Exterior	See Table 705.5											
Nonbearing walls and partitions Interior[d]	0	0	0	0	0	0	0	0	0	See Section 2304.11.2	0	0
Floor construction and associated secondary structural members (see Section 202)	2	2	1	0	1	0	2	2	2	HT	1	0
Roof construction and associated secondary structural members (see Section 202)	$1^1/_2$[b]	1[b,c]	1[b,c]	0[c]	1[b,c]	0	$1^1/_2$	1	1	HT	1	0

For SI: 1 foot = 304.8 mm.

a. Roof supports: Fire-resistance ratings of primary structural frame and bearing walls are permitted to be reduced by 1 hour where supporting a roof only.

b. Where every part of the roof construction is 20 feet or more above the floor or mezzanine immediately below, fire protection of structural members in roof construction shall not be required, including protection of primary structural frame members, roof framing and decking, except where any of the following conditions apply.

1. In Group F-1, H, M, and S-1 occupancies.
2. Where the roof is an occupiable space.

Fire-retardant-treated wood members shall be allowed to be used for such unprotected members.

c. In all occupancies, heavy timber complying with Section 2304.11 shall be allowed for roof construction, including primary structural frame members, where a 1-hour or less fire-resistance rating is required.

d. Not less than the fire-resistance rating required by other sections of this code.

e. Not less than the fire-resistance rating based on fire separation distance (see Table 705.5).

f. Not less than the fire-resistance rating as referenced in Section 704.10.

g. Heavy timber bearing walls supporting more than two floors or more than a floor and a roof shall have a *fire-resistance rating* of not less than 1 hour.

SECTION 602
CONSTRUCTION CLASSIFICATION

Revise and add new sections as follows:

602.4 Type IV. ~~Type IV construction is that type of construction in which the exterior walls are of noncombustible materials and the interior building elements are of solid wood, laminated wood, heavy timber (HT) or structural composite lumber (SCL) without concealed spaces. The minimum dimensions for permitted materials including solid timber, glued-laminated timber, structural composite lumber (SCL), and cross-laminated timber and details of Type IV construction shall comply with the provisions of this section and Section 2304.11. Exterior walls complying with Section 602.4.4.1 or 602.4.4.2 shall be permitted. Interior walls and partitions not less than 1-hour fire-resistance rating or heavy timber complying with Section 2304.11.2.2 shall be permitted.~~ Type IV construction is that type of construction in which the *building elements* are *mass timber* or noncombustible materials and have *fire-resistance ratings* in accordance with Table 601. *Mass timber* elements shall meet the *fire-resistance-rating* requirements of this section based on either the *fire-resistance rating* of the n*oncombustible protection*, the *mass timber*, or a combination of both and shall be determined in accordance with Section 703.2. The minimum dimensions and permitted materials for *building elements* shall comply with the provisions of this section and Section 2304.11. *Mass timber* elements of Types IV-A, IV-B and IV-C construction shall be protected with *noncombustible protection* applied directly to the *mass timber* in accordance with Sections 602.4.1 through 602.4.3. The time assigned to the *noncombustible protection* shall be determined in accordance with Section 703.6 and comply with Section 722.7.

Cross-laminated timber shall be labeled as conforming to ANSI/APA PRG 320 as referenced in Section 2303.1.4.

Exterior *load-bearing walls* and *nonload-bearing walls* shall be *mass timber* construction, or shall be of noncombustible construction.

Exception: Exterior *load-bearing walls* and *nonload-bearing walls* of Type IV-HT construction in accordance with Section 602.4.4.

The interior *building elements*, including *nonload-bearing walls* and partitions, shall be of *mass timber* construction or of noncombustible construction.

Exception: Interior *building elements* and nonload-bearing walls and partitions of Type IV-HT construction in accordance with Section 602.4.4.

Combustible concealed spaces are not permitted except as otherwise indicated in Sections 602.4.1 through 602.4.4. Combustible stud spaces within light frame walls of Type IV-HT construction shall not be considered concealed spaces, but shall comply with Section 718.

In *buildings* of Type IV-A, IV-B, and IV-C construction with an occupied floor located more than 75 feet (22 860 mm) above the lowest level of fire department vehicle access, up to and including 12 *stories* or 180 feet (54 864 mm) above *grade plane*, *mass timber* interior exit and elevator hoistway enclosures shall be protected in accordance with Section 602.4.1.2. In *buildings* greater than 12 *stories* or 180 feet (54 864 mm) above *grade plane*, interior exit and elevator hoistway enclosures shall be constructed of noncombustible materials.

602.4.1 Type IV-A. *Building elements* in Type IV-A construction shall be protected in accordance with Sections 602.4.1.1 through 602.4.1.6. The required *fire-resistance rating* of noncombustible elements and protected *mass timber* elements shall be determined in accordance with Section 703.2.

602.4.1.1 Exterior protection. The outside face of *exterior walls* of *mass timber* construction shall be protected with *noncombustible protection* with a minimum assigned time of 40 minutes, as specified in Table 722.7.1(1). Components of the *exterior wall covering* shall be of noncombustible material except *water-resistive barriers* having a peak heat release rate of less than 150kW/m^2, a total heat release of

less than 20 MJ/m^2 and an effective heat of combustion of less than 18MJ/kg as determined in accordance with ASTM E1354 and having a *flame spread index* of 25 or less and a *smoke-developed index* of 450 or less as determined in accordance with ASTM E84 or UL 723. The ASTM E1354 test shall be conducted on specimens at the thickness intended for use, in the horizontal orientation and at an incident radiant heat flux of 50 kW/m^2.

602.4.1.2 Interior protection. Interior faces of all *mass timber* elements, including the inside faces of exterior *mass timber* walls and *mass timber* roofs, shall be protected with materials complying with Section 703.3.

602.4.1.2.1 Protection time. *Noncombustible protection* shall contribute a time equal to or greater than times assigned in Table 722.7.1(1), but not less than 80 minutes. The use of materials and their respective protection contributions specified in Table 722.7.1(2) shall be permitted to be used for compliance with Section 722.7.1.

602.4.1.3 Floors. The floor assembly shall contain a noncombustible material not less than 1 inch (25 mm) in thickness above the *mass timber*. Floor finishes in accordance with Section 804 shall be permitted on top of the noncombustible material. The underside of floor assemblies shall be protected in accordance with Section 602.4.1.2.

602.4.1.4 Roofs. The *interior surfaces* of *roof assemblies* shall be protected in accordance with Section 602.4.1.2. *Roof coverings* in accordance with Chapter 15 shall be permitted on the outside surface of the *roof assembly*.

602.4.1.5 Concealed spaces. Concealed spaces shall not contain combustibles other than electrical, mechanical, fire protection, or plumbing materials and equipment permitted in plenums in accordance with Section 602 of the *Florida Building Code, Mechanical*, and shall comply with all applicable provisions of Section 718. Combustible construction forming concealed spaces shall be protected in accordance with Section 602.4.1.2.

602.4.1.6 Shafts. *Shafts* shall be permitted in accordance with Sections 713 and 718. Both the *shaft* side and room side of *mass timber* elements shall be protected in accordance with Section 602.4.1.2.

602.4.2 Type IV-B. *Building elements* in Type IV-B construction shall be protected in accordance with Sections through 602.4.2.6. The required *fire-resistance rating* of noncombustible elements or *mass timber* elements shall be determined in accordance with Section 703.2.

602.4.2.1 Exterior protection. The outside face of *exterior walls* of *mass timber* construction shall be protected with *noncombustible protection* with a minimum assigned time of 40 minutes, as specified in Table 722.7.1(1). Components of the *exterior wall covering* shall be of noncombustible material except *water-resistive barriers* having a peak heat release rate of less than 150kW/m^2, a total heat release of less than 20 MJ/m^2 and an effective heat of combustion of less than 18MJ/kg as determined in accordance with ASTM E1354, and having a *flame spread index* of 25 or less and a *smoke-developed index* of 450 or less as determined in accordance with ASTM E84 or UL 723. The ASTM E1354 test shall be conducted on specimens at the thickness intended for use, in the horizontal orientation and at an incident radiant heat flux of 50 kW/m^2.

602.4.2.2 Interior protection. Interior faces of all *mass timber* elements, including the inside face of exterior *mass timber* walls and *mass timber* roofs, shall be protected, as required by this section, with materials complying with Section 703.3.

602.4.2.2.1 Protection time. *Noncombustible protection* shall contribute a time equal to or greater than times assigned in Table 722.7.1(1), but not less than 80 minutes. The use of materials and their respective protection contributions specified in Table 722.7.1(2) shall be

permitted to be used for compliance with Section 722.7.1.

602.4.2.2.2 Protected area. Interior faces of *mass timber* elements, including the inside face of exterior *mass timber* walls and *mass timber* roofs, shall be protected in accordance with Section 602.4.2.2.1.

Exceptions: Unprotected portions of *mass timber* ceilings and walls complying with Section 602.4.2.2.4 and the following:

1. Unprotected portions of *mass timber* ceilings and walls complying with one of the following:

1.1 Unprotected portions of *mass timber* ceilings, including attached beams, shall be permitted and shall be limited to an area less than or equal to 100 percent of the floor area in any *dwelling unit* within a story or *fire area* within a story.

1.2 Unprotected portions of *mass timber* walls, including attached columns, shall be permitted and shall be limited to an area less than or equal to 40 percent of the floor area in any *dwelling unit* within a story or *fire area* within a story.

1.3 Unprotected portions of both walls and ceilings of *mass timber*, including attached columns and beams, in any *dwelling unit* or *fire area* shall be permitted in accordance with Section 602.4.2.2.3.

2. *Mass timber* columns and beams that are not an integral portion of walls or ceilings, respectively, shall be permitted to be unprotected without restriction of either aggregate area or separation from one another.

602.4.2.2.3 Mixed unprotected areas. In each *dwelling unit* or *fire area*, where both portions of ceilings and portions of walls are unprotected, the total allowable unprotected area shall be determined in accordance with Equation 6-1.

$$(U_{tc}/\ U_{ac})+(U_{tw}/U_{aw}) \leq 1 \quad \textbf{(Equation 6-1)}$$

where:

U_{tc} = Total unprotected *mass timber* ceiling areas.

U_{ac} = Allowable unprotected *mass timber* ceiling area conforming to Exception 1.1 of Section 602.4.2.2.2.

U_{tw} = Total unprotected *mass timber* wall areas.

U_{aw} = Allowable unprotected *mass timber* wall area conforming to Exception 1.2 of Section 602.4.2.2.2.

602.4.2.2.4 Separation distance between unprotected mass timber elements. In each *dwelling unit* or *fire area*, unprotected portions of *mass timber* walls shall be not less than 15 feet (4572 mm) from unprotected portions of other walls measured horizontally along the floor.

602.4.2.3 Floors. The floor assembly shall contain a noncombustible material not less than 1 inch (25 mm) in thickness above the *mass timber*. Floor finishes in accordance with Section 804 shall be permitted on top of the noncombustible material. Except where unprotected *mass timber* ceilings are permitted in Section 602.4.2.2.2, the underside of floor assemblies shall be protected in accordance with

Section 602.4.1.2.

602.4.2.4 Roofs. The *interior surfaces* of roof assemblies shall be protected in accordance with Section 602.4.2.2 except, in nonoccupiable spaces, they shall be treated as a concealed space with no portion left unprotected. *Roof coverings* in accordance with Chapter 15 shall be permitted on the outside surface of the roof assembly.

602.4.2.5 Concealed spaces. Concealed spaces shall not contain combustibles other than electrical, mechanical, fire protection, or plumbing materials and equipment permitted in plenums in accordance with Section 602 of the *Florida Building Code, Mechanical*, and shall comply with all applicable provisions of Section 718. Combustible construction forming concealed spaces shall be protected in accordance with Section 602.4.1.2.

602.4.2.6 Shafts. *Shafts* shall be permitted in accordance with Sections 713 and 718. Both the *shaft* side and room side of *mass timber* elements shall be protected in accordance with Section 602.4.1.2.

602.4.3 Type IV-C. *Building elements* in Type IV-C construction shall be protected in accordance with Sections 602.4.3.1 through 602.4.3.6. The required *fire-resistance rating* of *building elements* shall be determined in accordance with Section 703.2.

602.4.3.1 Exterior protection. The exterior side of walls of combustible construction shall be protected with *noncombustible protection* with a minimum assigned time of 40 minutes, as determined in Table 722.7.1(1). Components of the *exterior wall covering* shall be of noncombustible material except *water-resistive barriers* having a peak heat release rate of less than 150 kW/m^2, a total heat release of less than 20 MJ/m^2 and an effective heat of combustion of less than 18 MJ/kg as determined in accordance with ASTM E1354 and having a *flame spread index* of 25 or less and a *smoke-developed index* of 450 or less as determined in accordance with ASTM E84 or UL 723. The ASTM E1354 test shall be conducted on specimens at the thickness intended for use, in the horizontal orientation and at an incident radiant heat flux of 50 kW/m^2.

602.4.3.2 Interior protection. *Mass timber* elements are permitted to be unprotected.

602.4.3.3 Floors. Floor finishes in accordance with Section 804 shall be permitted on top of the floor construction.

602.4.3.4 Roof coverings. *Roof coverings* in accordance with Chapter 15 shall be permitted on the outside surface of the roof assembly.

602.4.3.5 Concealed spaces. Concealed spaces shall not contain combustibles other than electrical, mechanical, fire protection, or plumbing materials and equipment permitted in plenums in accordance with Section 602 of the *Florida Building Code, Mechanical*, and shall comply with all applicable provisions of Section 718. Combustible construction forming concealed spaces shall be protected with *noncombustible protection* with a minimum assigned time of 40 minutes, as specified in Table 722.7.1(1).

602.4.3.6 Shafts. *Shafts* shall be permitted in accordance with Sections 713 and 718. *Shafts* and elevator hoistway and *interior exit stairway enclosures* shall be protected with *noncombustible protection* with a minimum assigned time of 40 minutes, as specified in Table 722.7.1(1), on both the inside of the *shaft* and the outside of the *shaft*.

602.4.4 Type IV-HT. Type IV-HT (Heavy Timber) construction is that type of construction in which the *exterior walls* are of noncombustible materials and the interior *building elements* are of solid wood, laminated heavy timber or *structural composite lumber* (SCL), without concealed spaces or with concealed spaces complying with Section 602.4.4.3. The minimum dimensions for permitted materials including solid timber,

glued-laminated timber, SCL and *cross-laminated timber* (CLT) and the details of Type IV construction shall comply with the provisions of this section and Section 2304.11. *Exterior walls* complying with Section 602.4.4.1 or 602.4.4.2 shall be permitted. Interior walls and partitions not less than 1-hour fire-resistance rated or heavy timber conforming with Section 2304.11.2.2 shall be permitted.

~~602.4.1~~ **602.4.4.1. Fire-retardant-treated wood in *exterior walls*.** *Fire-retardant-treated wood* framing and sheathing complying with Section 2303.2 shall be permitted within *exterior wall* assemblies with a 2-hour rating or less.

~~602.4.2~~ **602.4.4.2 Cross-laminated timber in *exterior walls*.** *Cross-laminated timber* not less than 4 inches (102 mm) in thickness complying with Section 2303.1.4 shall be permitted within *exterior wall* assemblies with a 2-hour rating or less. Heavy timber structural members appurtenant to the *CLT exterior wall* shall meet the requirements of Table 2304.11 and be fire-resistance rated as required for the *exterior wall*. The exterior surface of the *cross-laminated timber* and heavy timber elements shall be ~~is~~ protected by one the following:

1. *Fire-retardant-treated wood* sheathing complying with Section 2303.2 and not less than 15/32 inch (12 mm) thick.
2. *Gypsum board* not less than 1/2 inch (12.7 mm) thick; or
3. A noncombustible material.

602.4.4.3 Concealed spaces. Concealed spaces shall not contain combustible materials other than *building elements* and electrical, mechanical, fire protection, or plumbing materials and equipment permitted in plenums in accordance with Section 602 of the *Florida Building Code, Mechanical*. Concealed spaces shall comply with applicable provisions of Section 718. Concealed spaces shall be protected in accordance with one or more of the following:

1. The building shall be sprinklered throughout in accordance with Section 903.3.1.1 and automatic sprinklers shall also be provided in the concealed space.
2. The concealed space shall be completely filled with noncombustible insulation.
3. Combustible surfaces within the concealed space shall be fully sheathed with not less than 5/8 -inch *Type X gypsum board*.

Exception: Concealed spaces within interior walls and partitions with a 1-hour or greater *fire-resistance rating* complying with Section 2304.11.2.2 shall not require additional protection.

~~602.4.3~~ **602.4.4.4 Exterior structural members.** Where a horizontal separation of 20 feet (6096 mm) or more is provided, wood columns and arches conforming to heavy timber sizes complying with Section 2304.11 shall be permitted to be used externally.

CHAPTER 7
FIRE AND SMOKE PROTECTION FEATURES

SECTION 703
FIRE-RESISTANCE RATINGS AND FIRE TESTS

Add new sections as follows:

703.8 Determination of noncombustible protection time contribution. The time, in minutes, contributed to the *fire-resistance rating* by the *noncombustible protection* of *mass timber building elements*, components, or assemblies, shall be established through a comparison of assemblies tested using procedures set forth in ASTM E119 or UL 263. The test assemblies shall be identical in construction, loading and materials, other than the *noncombustible protection*. The two test assemblies shall be tested to the same criteria of structural failure with the following conditions:

1. Test Assembly 1 shall be without protection.
2. Test Assembly 2 shall include the representative *noncombustible protection*. The protection shall be fully defined in terms of configuration details, attachment details, *joint* sealing details, accessories and all other relevant details.

The *noncombustible protection* time contribution shall be determined by subtracting the *fire-resistance* time, in minutes, of Test Assembly 1 from the *fire-resistance* time, in minutes, of Test Assembly 2.

703.9 Sealing of adjacent mass timber elements. In *buildings* of Types IV-A, IV-B and IV-C construction, sealant or adhesive shall be provided to resist the passage of air in the following locations:

1. At abutting edges and intersections of *mass timber building elements* required to be fire-resistance rated.
2. At abutting intersections of *mass timber building elements* and *building elements* of other materials where both are required to be fire-resistance rated.

Sealants shall meet the requirements of ASTM C920. Adhesives shall meet the requirements of ASTM D3498.

Exception: Sealants or adhesives need not be provided where they are not a required component of a tested fire-resistance-rated assembly.

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SECTION 705
PROJECTIONS

Revise table as follows:

TABLE 705.5
FIRE-RESISTANCE RATING REQUIREMENTS FOR EXTERIOR WALLS BASED ON FIRE SEPARATION DISTANCE[a, d, g]

FIRE SEPARATION DISTANCE = X (feet)	TYPE OF CONSTRUCTION	OCCUPANCY GROUP H[e]	OCCUPANCY GROUP F-1, M, S-1[f]	OCCUPANCY GROUP A, B, E, F-2, I, R, S-2, U[h]
X < 5[b]	All	3	2	1
5 ≤ X < 10	IA, IVA	3	2	1
	Others	2	1	1
10 ≤ X < 30	IA, IB, IVA, IVB	2	1	1[c]
	IIB, VB	1	0	0
	Others	1	1	1[c]
X ≥ 30	All	0	0	0

For SI: 1 foot = 304.8 mm.

a. Load-bearing exterior walls shall also comply with the fire-resistance rating requirements of Table 601.
b. See Section 706.1.1 for party walls.
c. Open parking garages complying with Section 406 shall not be required to have a fire-resistance rating.
d. The fire-resistance rating of an exterior wall is determined based upon the fire separation distance of the exterior wall and the story in which the wall is located.
e. For special requirements for Group H occupancies, see Section 415.6.
f. For special requirements for Group S aircraft hangars, see Section 412.4.1.
g. Where Table 705.8 permits nonbearing exterior walls with unlimited area of unprotected openings, the required fire-resistance rating for the exterior walls is 0 hours.
h. For a building containing only a Group U occupancy private garage or carport, the exterior wall shall not be required to have a fire-resistance rating where the fire separation distance is 5 feet (1523 mm) or greater.

SECTION 718
CONCEALED SPACES

Revise section as follows:

718.2.1 Fireblocking materials. *Fireblocking* shall consist of the following materials:

1. Two-inch (51 mm) nominal lumber.
2. Two thicknesses of 1-inch (25 mm) nominal lumber with broken lap joints.
3. One thickness of 0.719-inch (18.3 mm) *wood structural panels* with joints backed by 0.719-inch (18.3 mm) *wood structural panels.*
4. One thickness of 0.75-inch (19.1 mm) *particleboard* with joints backed by 0.75-inch (19 mm) *particleboard.*
5. One-half-inch (12.7 mm) *gypsum board.*
6. One-fourth-inch (6.4 mm) cement-based millboard.
7. Batts or blankets of *mineral wool*, *mineral fiber* or other *approved* materials installed in such a manner as to be securely retained in place.
8. Cellulose insulation-installed as tested for the specific application.
9. *Mass timber* complying with Section 2304.11.
10. One thickness of $^{19}/_{32}$-inch (15.1 mm) *fire-retardant-treated wood* structural panel complying with Section 2303.2.

SECTION 722
CALCULATED FIRE-RESISTANCE

Add new sections as follows:

722.7 Fire-resistance rating for mass timber. The required *fire resistance* of *mass timber* elements in Section 602.4 shall be determined in accordance with Section 703.2. The *fire-resistance rating* of *building elements* shall be as required in Tables 601 and 705.5 and as specified elsewhere in this code. The *fire-resistance rating* of the *mass timber* elements shall consist of the *fire resistance* of the unprotected element added to the protection time of the *noncombustible protection*.

722.7.1 Minimum required protection. Where required by Sections 602.4.1 through 602.4.3, *noncombustible protection* shall be provided for *mass timber building elements* in accordance with Table 722.7.1(1). The rating, in minutes, contributed by the *noncombustible protection* of *mass timber building elements*, components or assemblies, shall be established in accordance with Section 703.6. The protection contributions indicated in Table 722.7.1(2) shall be deemed to comply with this requirement where installed and fastened in accordance with Section 722.7.2.

TABLE 722.7.1(1)
PROTECTION REQUIRED FROM NONCOMBUSTIBLE COVERING MATERIAL

REQUIRED FIRE-RESISTANCE RATING OF BUILDING ELEMENT PER Table 601 AND Table 602 (hours)	MINIMUM PROTECTION REQUIRED FROM NONCOMBUSTIBLE PROTECTION (minutes)
1	40
2	80
3 or more	120

TABLE 722.7.1(2)
PROTECTION PROVIDED BY NONCOMBUSTIBLE COVERING MATERIAL

NONCOMBUSTIBLE PROTECTION	PROTECTION CONTRIBUTION (minutes)
1/2-inch Type X gypsum board	25
5/8-inch Type X gypsum board	40

722.7.2 Installation of gypsum board noncombustible protection. *Gypsum board* complying with Table 722.7.1(2) shall be installed in accordance with this section.

722.7.2.1 Interior surfaces. Layers of *Type X gypsum board* serving as *noncombustible protection* for *interior surfaces* of wall and ceiling assemblies determined in accordance with Table 722.7.1(1) shall be installed in accordance with the following:

1. Each layer shall be attached with Type S drywall screws of sufficient length to penetrate the *mass timber* at least 1 inch (25 mm) when driven flush with the paper surface of the *gypsum board*.

   Exception: The third layer, where determined necessary by Section 722.7, shall be permitted to be attached with 1-inch (25 mm) No. 6 Type S drywall screws to furring channels in accordance with AISI S220.

2. Screws for attaching the base layer shall be 12 inches (305 mm) on center in both directions.

3. Screws for each layer after the base layer shall be 12 inches (305 mm) on center in both directions and offset from the screws of the previous layers by 4 inches (102 mm) in both directions.

4. All panel edges of any layer shall be offset 18 inches (457 mm) from those of the previous layer.

5. All panel edges shall be attached with screws sized and offset as in Items 1 through 4 and placed at least 1 inch (25 mm) but not more than 2 inches (51 mm) from the panel edge.

6. All panels installed at wall-to-ceiling intersections shall be installed such that ceiling panels are installed first and the wall panels are installed after the ceiling panel has been installed and is fitted tight to the ceiling panel. Where multiple layers are required, each layer shall repeat this process.

7. All panels installed at a wall-to-wall intersection shall be installed such that the panels covering an *exterior wall* or a wall with a greater *fire-resistance rating* shall be installed first and the panels covering the other wall shall be fitted tight to the panel covering the first wall. Where multiple layers are required, each layer shall repeat this process.

8. Panel edges of the face layer shall be taped and finished with joint compound. Fastener heads shall be covered with joint compound.

9. Panel edges protecting *mass timber* elements adjacent to unprotected *mass timber* elements in accordance with Section 602.4.2.2 shall be covered with 11/4-inch (32 mm) metal corner bead and finished with joint compound.

722.7.2.2 Exterior surfaces. Layers of *Type X gypsum board* serving as *noncombustible protection* for the outside of the exterior *mass timber* walls determined in accordance with Table 722.7.1(1) shall be fastened 12 inches (305 mm) on center each way and 6 inches (152 mm) on center at all joints or ends. All panel edges shall be attached with fasteners located at least 1 inch (25 mm) but not more than 2 inches (51 mm) from the panel edge. Fasteners shall comply with one of the following:

1. Galvanized nails of minimum 12 gage with a 7/16-inch (11 mm) head of sufficient length to penetrate the *mass timber* a minimum of 1 inch (25 mm).

2. Screws that comply with ASTM C1002 (Type S, W or G) of sufficient length to penetrate the *mass timber* a minimum of 1 inch (25 mm).

CHAPTER 4

SPECIAL DETAILED REQUIREMENTS BASED ON OCCUPANCY AND USE

SECTION 403
HIGH-RISE BUILDINGS

Revise section as follows:

403.3.2 Water supply to required fire pumps. In all *buildings* that are more than 420 feet (128 000 mm) in *building height* and *buildings* of Type IV-A and IV-B construction that are more than 120 feet (36 576 mm) in *building height*, required fire pumps shall be supplied by connections to no fewer than two water mains located in different streets. Separate supply piping shall be provided between each connection to the water main and the pumps. Each connection and the supply piping between the connection and the pumps shall be sized to supply the flow and pressure required for the pumps to operate.

Exception: Two connections to the same main shall be permitted provided the main is valved such that an interruption can be isolated so that the water supply will continue without interruption through no fewer than one of the connections.

CHAPTER 33
SAFEGUARDS DURING CONSTRUCTION

Add new section as follows:

SECTION 3314
FIRE SAFETY REQUIREMENTS FOR BUILDINGS OF TYPES IV-A, IV-B, AND IV-C CONSTRUCTION

[F] 3314.1 Fire safety requirements for buildings of Types IV-A, IV-B, and IV-C construction. Buildings of Types IV-A, IV-B, and IV-C construction designed to be greater than six stories above grade plane shall comply with the following requirements during construction unless otherwise approved by the fire code official.

1. Standpipes shall be provided in accordance with Section 3313.

2. A water supply for fire department operations, as approved by the fire code official and the fire chief.

3. Where building construction exceeds six stories above grade plane, at least one layer of noncombustible protection where required by Section 602.4 shall be installed on all building elements more than 4 floor levels, including mezzanines, below active *mass timber* construction before erecting additional floor levels.

   Exceptions:
   1. *Shafts* and vertical exit enclosures shall not be considered a part of the active mass timber construction.
   2. Noncombustible material on the top of mass timber floor assemblies shall not be required before erecting additional floor levels.

4. Where building construction exceeds six stories above grade plane required exterior wall coverings shall be installed on all floor levels more than 4 floor levels, including mezzanines, below active mass timber construction before erecting additional floor level.

   Exception: *Shafts* and vertical exit enclosures shall not be considered a part of the active mass timber construction.

CHAPTER 23
WOOD

SECTION 2301
GENERAL

Revise section as follows:

2301.3 ~~Nominal sizes~~ Dimensions. For the purposes of this chapter, where dimensions of lumber are specified, they shall be deemed to be nominal dimensions unless specifically designated as actual dimensions (see Section 2304.2). Where dimensions of *cross-laminated timber* thickness are specified, they shall be deemed to be actual dimensions.

SECTION 2304
GENERAL CONSTRUCTION REQUIREMENTS

Add new section and revise sections as follows:

2304.10.8 Fire protection of connections. Connections used with *fire-resistance*-rated members and in fire-resistance-rated assemblies of Type IV-A, IV-B or IV-C construction shall be protected for the time associated with the fire-resistance rating. Protection time shall be determined by one of the following:

1. Testing in accordance with Section 703.2 where the connection is part of the *fire resistance* test.

2. Engineering analysis that demonstrates that the temperature rise at any portion of the connection is limited to an average temperature rise of 250°F (139°C), and a maximum temperature rise of 325°F (181°C), for a time corresponding to the required *fire-resistance* rating of the structural element being connected. For the purposes of this analysis, the connection includes connectors, fasteners, and portions of wood members included in the structural design of the connection.

2304.11.1.1 Columns. Minimum dimensions of columns shall be in accordance with Table 2304.11. Columns shall be connected in an *approved* manner. Columns shall be continuous or aligned vertically from floor to floor in ~~superimposed throughout~~ all stories of Type IV-HT construction ~~and connected in an approved manner~~. Girders and beams at column connections shall be closely fitted around columns and adjoining ends shall be cross tied to each other, or intertied by caps or ties, to transfer horizontal *loads* across joints. Wood bolsters shall not be placed on tops of columns unless the columns support roof *loads* only. Where traditional heavy timber detailing is used, connections shall be permitted to be by means of reinforced concrete or metal caps with brackets, by properly designed steel or iron caps, with pintles and base plates, by timber splice plates affixed to the columns by metal connectors housed within the contact faces, or by other *approved* methods.

2304.11.3 Floors. Floors shall be without concealed spaces or with concealed spaces complying with Section 602.4.4. Wood floors shall be constructed in accordance with Section 2304.11.3.1 or 2304.11.3.2.

2304.11.4 Roof decks. Roofs shall be without concealed spaces ~~and roof~~ or with concealed spaces complying with Section 602.4.3. Roof decks shall be constructed in accordance with Section 2304.11.4.1 or 2304.11.4.2. Other types of decking shall be an alternative that provides equivalent *fire resistance* and structural properties are being provided. Where supported by a wall, *roof decks* shall be anchored to walls to resist forces determined in accordance with Chapter 16. Such anchors shall consist of steel bolts, lags, screws or *approved* hardware of sufficient strength to resist prescribed forces.

CHAPTER 17
SPECIAL INSPECTION AND TESTS

SECTION 1711
MASS TIMBER CONSTRUCTION

Add new sections and table as follows:

1711.1 Mass timber construction. Inspections of mass timber elements in Types IV-A, IV-B and IV-C construction shall be in accordance with Table 1711.1.

TABLE 1711.1
REQUIRED INSPECTIONS OF MASS TIMBER CONSTRUCTION

	TYPE		CONTINUOUS SPECIAL INSPECTION	PERIODIC INSPECTION
1.	Inspection of anchorage and connections of mass timber construction to timber deep foundation systems.		—	X
2.	Inspect erection of mass timber construction.		—	X
3.	Inspection of connections where installation methods are required to meet design loads.			
	Threaded fasteners	Verify use of proper installation equipment.	—	X
		Verify use of pre-drilled holes where required.	—	X
		Inspect screws, including diameter, length, head type, spacing, installation angle and depth.	—	X
	Adhesive anchors installed in horizontal or upwardly inclined orientation to resist sustained tension loads.		X	—
	Adhesive anchors not defined in preceding cell.		—	X
	Bolted connections.		—	X
	Concealed connections.		—	X

1711.2 Sealing of mass timber. Periodic *special inspections* of sealants or adhesives shall be conducted where sealant or adhesive required by Section 703.7 is applied to *mass timber building elements* as designated in the *approved construction documents*.

CHAPTER 1
SCOPE AND ADMINISTRATION

SECTION 110
INSPECTIONS

Add new section as follows:

110.3.14 Types IV-A, IV-B, and IV-C connection protection inspection. In buildings of Types IV-A, IV-B, and IV-C construction, where connection fire-resistance ratings are provided by wood cover calculated to meet the requirements of Section 2304.10.8, inspection of the wood cover shall be made after the cover is installed, but before any other coverings or finishes are installed.

CHAPTER 2
DEFINITIONS

SECTION 202
DEFINITIONS

Revise and add new definitions as follows:

[BS] WALL, LOAD-BEARING. Any wall meeting either of the following classifications:

1. Any metal or wood stud wall that supports more than 100 pounds per linear foot (1459 N/m) of vertical load in addition to its own weight.
2. Any *masonry*, ~~or~~ concrete, or *mass timber* wall that supports more than 200 pounds per linear foot (2919 N/m) of vertical load in addition to its own weight.

MASS TIMBER. Structural elements of Type IV construction primarily of solid, built-up, panelized or engineered wood products that meet minimum cross section dimensions of Type IV construction.

NONCOMBUSTIBLE PROTECTION (FOR MASS TIMBER). Noncombustible material, in accordance with Section 703.5, designed to increase the *fire-resistance rating* and delay the combustion of *mass timber*.

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CHAPTER 5
GENERAL BUILDING HEIGHTS AND AREAS

SECTION 504
BUILDING HEIGHT AND NUMBER OF STORIES

Revise tables as follows:

TABLE 504.3[a]
ALLOWABLE BUILDING HEIGHT IN FEET ABOVE GRADE PLANE

OCCUPANCY CLASSIFICATION	See Footnotes	TYPE OF CONSTRUCTION											
		Type I		Type II		Type III		Type IV				Type V	
		A	B	A	B	A	B	A	B	C	HT	A	B
A, B, E, F, M, S, U	NS[b]	UL	160	65	55	65	55	65	65	65	65	50	40
	S	UL	180	85	75	85	75	270	180	85	85	70	60
H-1, H-2, H-3, H-5	NS[c,d]	UL	160	65	55	65	55	120	90	65	65	50	40
	S												
H-4	NS[c,d]	UL	160	65	55	65	55	65	65	65	65	50	40
	S	UL	180	85	75	85	75	140	100	85	85	70	60
I-1Condition 1, I-3	NS[d,e]	UL	160	65	55	65	55	65	65	65	65	50	40
	S	UL	180	85	75	85	75	180	120	85	85	70	60
I-1Condition 2, I-2	NS[d,e,f]	UL	160	65	55	65	55	65	65	65	65	50	40
	S	UL	180	85									
I-4	NS[d,g]	UL	160	65	55	65	55	65	65	65	65	50	40
	S	UL	180	85	75	85	75	180	120	85	85	70	60
R_h	NS[d,h]	UL	160	65	55	65	55	65	65	65	65	50	40
	S13R	60	60	60	60	60	60	60	60	60	60	60	60
	S	UL	180	85	75	85	75	270	180	85	85	70	60

For SI: 1 foot = 304.8 mm.

Note: UL = Unlimited; NS = Buildings not equipped throughout with an automatic sprinkler system; S = Buildings equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1; S13R = Buildings equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.2;

a. See Chapters 4 and 5 for specific exceptions to the allowable height in this chapter.
b. See Section 903.2 for the minimum thresholds for protection by an automatic sprinkler system for specific occupancies.
c. New Group H occupancies are required to be protected by an automatic sprinkler system in accordance with Section 903.2.5.
d. The NS value is only for use in evaluation of existing building height in accordance with the *Florida Building Code, Existing Building*.
e. New Group I-1 and I-3 occupancies are required to be protected by an automatic sprinkler system in accordance with Section 903.2.6. For new Group I-1 occupancies Condition 1, see Exception 1 of Section 903.2.6.
f. New and existing Group I-2 occupancies are required to be protected by an automatic sprinkler system in accordance with Section 903.2.6 and the *Florida Fire Prevention Code*.
g. For new Group I-4 occupancies, see Exceptions 2 and 3 of Section 903.2.6.
h. New Group R occupancies are required to be protected by an automatic sprinkler system in accordance with Section 903.2.8.

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TABLE 504.4[a, b]
ALLOWABLE NUMBER OF STORIES ABOVE GRADE PLANE

OCCUPANCY CLASSIFICATION	See Footnotes	TYPE OF CONSTRUCTION											
		Type I		Type II		Type III		Type IV				Type V	
		A	B	A	B	A	B	A	B	C	HT	A	B
A-1	NS	UL	5	3	2	3	2	3	3	3	3	2	1
	S	UL	6	4	3	4	3	9	6	4	4	3	2
A-2	NS	UL	11	3	2	3	2	3	3	3	3	2	1
	S	UL	12	4	3	4	3	18	12	6	4	3	2
A-3	NS	UL	11	3	2	3	2	3	3	3	3	2	1
	S	UL	12	4	3	4	3	18	12	6	4	3	2
A-4	NS	UL	11	3	2	3	2	3	3	3	3	2	1
	S	UL	12	4	3	4	3	18	12	6	4	3	2
A-5	NS	UL	UL	UL	UL	UL	UL	1	1	1	UL	UL	UL
	S	UL	UL	UL	UL	UL	UL	UL	UL	UL	UL	UL	UL
B	NS	UL	11	5	3	5	3	5	5	5	5	3	2
	S	UL	12	6	4	6	4	18	12	9	6	4	3
E	NS	UL	5	3	2	3	2	3	3	3	3	1	1
	S	UL	6	4	3	4	3	9	6	4	4	2	2
F-1	NS	UL	11	4	2	3	2	3	3	3	4	2	1
	S	UL	12	5	3	4	3	10	7	5	5	3	2
F-2	NS	UL	11	5	3	4	3	5	5	5	5	3	2
	S	UL	12	6	4	5	4	12	8	6	6	4	3
H-1	NS[c, d]	1	1	1	1	1	1	NP	NP	NP	1	1	NP
	S							1	1	1			
H-2	NS[c, d]	UL	3	2	1	2	1	1	1	1	2	1	1
	S							2	2	2			
H-3	NS[c, d]	UL	6	4	2	4	2	3	3	3	4	2	1
	S							4	4	4			
H-4	NS[c, d]	UL	7	5	3	5	3	5	5	5	5	3	2
	S	UL	8	6	4	6	4	8	7	6	6	4	3
H-5	NS[c, d]	4	4	3	3	3	3	2	2	2	3	3	2
	S							3	3	3			
I-1 Condition 1	NS[d, e]	UL	9	4	3	4	3	4	4	4	4	3	2
	S	UL	10	5	4	5	4	10	7	5	5	4	3
I-1 Condition 2	NS[d, e]	UL	9	4	3	4	3	3	3	3	4	3	2
	S	UL	10	5				10	6	4			
I-2	NS[d, f]	UL	4	2	1	1	NP	NP	NP	NP	1	1	NP
	S	UL	5	3				7	5	1			
I-3	NS[d, e]	UL	4	2	1	2	1	2	2	2	2	2	1
	S	UL	5	3	2	3	2	7	5	3	3	3	2
I-4	NS[d, g]	UL	5	3	2	3	2	3	3	3	3	1	1
	S	UL	6	4	3	4	3	9	6	4	4	2	2
M	NS	UL	11	4	2	4	2	4	4	4	4	3	1
	S	UL	12	5	3	5	3	12	8	6	5	4	2

(continued)

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TABLE 504.4[a, b]—continued
ALLOWABLE NUMBER OF STORIES ABOVE GRADE PLANE

OCCUPANCY CLASSIFICATION	See Footnotes	TYPE OF CONSTRUCTION											
		Type I		Type II		Type III		Type IV				Type V	
		A	B	A	B	A	B	A	B	C	HT	A	B
R-1	NS[d, h]	UL	11	4	4	4	4	4	4	4	4	3	2
	S13R	4	4									4	3
	S	UL	12	5	5	5	5	18	12	8	5	4	3
R-2	NS[d, h]	UL	11	4	4	4	4	4	4	4	4	3	2
	S13R	4	4	4								4	3
	S	UL	12	5	5	5	5	18	12	8	5	4	3
R-3	NS[d, h]	UL	11	4	4	4	4	4	4	4	4	3	3
	S13R	4	4									4	4
	S	UL	12	5	5	5	5	18	12	5	5	4	4
R-4	NS[d, h]	UL	11	4	4	4	4	4	4	4	4	3	2
	S13R	4	4									4	3
	S	UL	12	5	5	5	5	18	12	5	5	4	3
S-1	NS	UL	11	4	2	3	2	4	4	4	4	3	1
	S	UL	12	5	4	4	4	10	7	5	5	4	2
S-2	NS	UL	11	5	3	4	3	4	4	4	5	4	2
	S	UL	12	6	4	5	4	12	8	5	6	5	3
U	NS	UL	5	4	2	3	2	4	4	4	4	2	1
	S	UL	6	5	3	4	3	9	6	5	5	3	2

Note: UL = Unlimited; NP = Not Permitted; NS = Buildings not equipped throughout with an automatic sprinkler system; S = Buildings equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1; S13R = Buildings equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.2.

a. See Chapters 4 and 5 for specific exceptions to the allowable height in this chapter.
b. See Section 903.2 for the minimum thresholds for protection by an automatic sprinkler system for specific occupancies.
c. New Group H occupancies are required to be protected by an automatic sprinkler system in accordance with Section 903.2.5.
d. The NS value is only for use in evaluation of existing *building height* in accordance with the *Florida Building Code, Existing Building*.
e. New Group I-1 and I-3 occupancies are required to be protected by an automatic sprinkler system in accordance with Section 903.2.6. For new Group I-1 occupancies, Condition 1, see Exception 1 of Section 903.2.6.
f. New and existing Group I-2 occupancies are required to be protected by an automatic sprinkler system in accordance with Section 903.2.6 and the *Florida Fire Prevention Code*.
g. For new Group I-4 occupancies, see Exceptions 2 and 3 of Section 903.2.6.
h. New Group R occupancies are required to be protected by an automatic sprinkler system in accordance with Section 903.2.8

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SECTION 506
BUILDING AREA

Revise table as follows:

TABLE 506.2[a, b]
ALLOWABLE AREA FACTOR (A_t = NS, S1, S13R, or SM, as applicable)
IN SQUARE FEET

OCCUPANCY CLASSIFICATION	SEE FOOTNOTES	TYPE OF CONSTRUCTION											
		Type I		Type II		Type III		Type IV				Type V	
		A	B	A	B	A	B	A	B	C	HT	A	B
A-1	NS	UL	UL	15,500	8,500	14,000	8,500	45,000	30,000	18,750	15,000	11,500	5,500
	S1	UL	UL	62,000	34,000	56,000	34,000	180,000	120,000	75,000	60,000	46,000	22,000
	SM	UL	UL	46,500	25,500	42,000	25,500	135,000	90,000	56,250	45,000	34,500	16,500
A-2	NS	UL	UL	15,500	9,500	14,000	9,500	45,000	30,000	18,750	15,000	11,500	6,000
	S1	UL	UL	62,000	38,000	56,000	38,000	180,000	120,000	75,000	60,000	46,000	24,000
	SM	UL	UL	46,500	28,500	42,000	28,500	135,000	90,000	56,250	45,000	34,500	18,000
A-3	NS	UL	UL	15,500	9,500	14,000	9,500	45,000	30,000	18,750	15,000	11,500	6,000
	S1	UL	UL	62,000	38,000	56,000	38,000	180,000	120,000	75,000	60,000	46,000	24,000
	SM	UL	UL	46,500	28,500	42,000	28,500	135,000	90,000	56,250	45,000	34,500	18,000
A-4	NS	UL	UL	15,500	9,500	14,000	9,500	45,000	30,000	18,750	15,000	11,500	6,000
	S1	UL	UL	62,000	38,000	56,000	38,000	180,000	120,000	75,000	60,000	46,000	24,000
	SM	UL	UL	46,500	28,500	42,000	28,500	135,000	90,000	56,250	45,000	34,500	18,000
A-5	NS	UL	UL	UL	UL	UL	UL	UL	UL	UL	UL	UL	UL
	S1												
	SM												
B	NS	UL	UL	37,500	23,000	28,500	19,000	108,000	72,000	45,000	36,000	18,000	9,000
	S1	UL	UL	150,000	92,000	114,000	76,000	432,000	288,000	180,000	144,000	72,000	36,000
	SM	UL	UL	112,500	69,000	85,500	57,000	324,000	216,000	135,000	108,000	54,000	27,000
E	NS	UL	UL	26,500	14,500	23,500	14,500	76,500	51,000	31,875	25,500	18,500	9,500
	S1	UL	UL	106,000	58,000	94,000	58,000	306,000	204,000	127,500	102,000	74,000	38,000
	SM	UL	UL	79,500	43,500	70,500	43,500	229,500	153,000	95,625	76,500	55,500	28,500
F-1	NS	UL	UL	25,000	15,500	19,000	12,000	100,500	67,000	41,875	33,500	14,000	8,500
	S1	UL	UL	100,000	62,000	76,000	48,000	402,000	268,000	167,500	134,000	56,000	34,000
	SM	UL	UL	75,000	46,500	57,000	36,000	301,500	201,000	125,625	100,500	42,000	25,500
F-2	NS	UL	UL	37,500	23,000	28,500	18,000	151,500	101,000	63,125	50,500	21,000	13,000
	S1	UL	UL	150,000	92,000	114,000	72,000	606,000	404,000	252,500	202,000	84,000	52,000
	SM	UL	UL	112,500	69,000	85,500	54,000	454,500	303,000	189,375	151,500	63,000	39,000
H-1	NS[c]	21,000	16,500	11,000	7,000	9,500	7,000	10,500	10,500	10,500	10,500	7,500	NP
	S1												
H-2	NS[c]	21,000	16,500	11,000	7,000	9,500	7,000	10,500	10,500	10,500	10,500	7,500	3,000
	S1												
	SM												
H-3	NS[c]	UL	60,000	26,500	14,000	17,500	13,000	25,500	25,500	25,500	25,500	10,000	5,000
	S1												
	SM												
H-4	NS[c, d]	UL	UL	37,500	17,500	28,500	17,500	72,000	54,000	40,500	36,000	18,000	6,500
	S1	UL	UL	150,000	70,000	114,000	70,000	288,000	216,000	162,000	144,000	72,000	26,000
	SM	UL	UL	112,500	52,500	85,500	52,500	216,000	162,000	121,500	108,000	54,000	19,500
H-5	NS[c, d]	UL	UL	37,500	23,000	28,500	19,000	72,000	54,000	40,500	36,000	18,000	9,000
	S1	UL	UL	150,000	92,000	114,000	76,000	288,000	216,000	162,000	144,000	72,000	36,000
	SM	UL	UL	112,500	69,000	85,500	57,000	216,000	162,000	121,500	108000	54,000	27,000

(continued)

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TABLE 506.2[a, b]—continued
ALLOWABLE AREA FACTOR (A_t = NS, S1, S13R, or SM, as applicable)
IN SQUARE FEET

OCCUPANCY CLASSIFICATION	SEE FOOTNOTES	TYPE OF CONSTRUCTION											
		Type I		Type II		Type III		Type IV				Type V	
		A	B	A	B	A	B	A	B	C	HT	A	B
I-1	NS[d, e]	UL	55,000	19,000	10,000	16,500	10,000	54,000	36,000	18,000	18,000	10,500	4,500
	S1	UL	220,000	76,000	40,000	66,000	40,000	216,000	144,000	72,000	72,000	42,000	18,000
	SM	UL	165,000	57,000	30,000	49,500	30,000	162,000	108,000	54,000	54,000	31,500	13,500
I-2	NS[d, f]	UL	UL	15,000	11,000	12,000	NP	36,000	24,000	12,000	12,000	9,500	NP
	S1	UL	UL	60,000	44,000	48,000	NP	144,000	96,000	48,000	48,000	38,000	NP
	SM	UL	UL	45,000	33,000	36,000	NP	108,000	72,000	36,000	36,000	28,500	NP
I-3	NS[d, e]	UL	UL	15,000	10,000	10,500	7,500	36,000	24,000	12,000	12,000	7,500	5,000
	S1	UL	UL	60,000	40,000	42,000	30,000	144,000	96,000	48,000	48,000	30,000	20,000
	SM	UL	UL	45,000	30,000	31,500	22,500	108,000	72,000	36,000	36,000	22,500	15,000
I-4	NS[d, g]	UL	60,500	26,500	13,000	23,500	13,000	76,500	51,000	25,500	25,500	18,500	9,000
	S1	UL	121,000	106,000	52,000	94,000	52,000	306,000	204,000	102,000	102,000	74,000	36,000
	SM	UL	181,500	79,500	39,000	70,500	39,000	229,500	153,000	76,500	76,500	55,500	27,000
M	NS	UL	UL	21,500	12,500	18,500	12,500	61,500	41,000	26,625	20,500	14,000	9,000
	S1	UL	UL	86,000	50,000	74,000	50,000	246,000	164,000	102,500	82,000	56,000	36,000
	SM	UL	UL	64,500	37,500	55,500	37,500	184,500	123,000	76,875	61,500	42,000	27,000
R-1	NS[d, h]	UL	UL	24,000	16,000	24,000	16,000	61,500	41,000	25,625	20,500	12,000	7,000
	S13R												
	S1	UL	UL	96,000	64,000	96,000	64,000	246,000	164,000	102,500	82,000	48,000	28,000
	SM	UL	UL	72,000	48,000	72,000	48,000	184,500	123,000	76,875	61,500	36,000	21,000
R-2	NS[d, h]	UL	UL	24,000	16,000	24,000	16,000	61,500	41,000	25,625	20,500	12,000	7,000
	S13R												
	S1	UL	UL	96,000	64,000	96,000	64,000	246,000	164,000	102,500	82,000	48,000	28,000
	SM	UL	UL	72,000	48,000	72,000	48,000	184,500	123,000	76,875	61,500	36,000	21,000
R-3	NS[d, h]	UL	UL	UL	UL	UL	UL	UL	UL	UL	UL	UL	UL
	S13R												
	S1												
	SM												
R-4	NS[d, h]	UL	UL	24,000	16,000	24,000	16,000	61,500	41,000	25,625	20,500	12,000	7,000
	S13R												
	S1	UL	UL	96,000	64,000	96,000	64,000	246,000	164,000	102,500	82,000	48,000	28,000
	SM	UL	UL	72,000	48,000	72,000	48,000	184,500	123,000	76,875	61,500	36,000	21,000
S-1	NS	UL	48,000	26,000	17,500	26,000	17,500	76,500	51,000	31,875	25,500	14,000	9,000
	S1	UL	192,000	104,000	70,000	104,000	70,000	306,000	204,000	127,500	102,000	56,000	36,000
	SM	UL	144,000	78,000	52,500	78,000	52,500	229,500	153,000	95,625	76,500	42,000	27,000
S-2	NS	UL	79,000	39,000	26,000	39,000	26,000	115,500	77,000	48,125	38,500	21,000	13,500
	S1	UL	316,000	156,000	104,000	156,000	104,000	462,000	308,000	192,500	154,000	84,000	54,000
	SM	UL	237,000	117,000	78,000	117,000	78,000	346,500	231,000	144,375	115,500	63,000	40,500
U	NS[i]	UL	35,500	19,000	8,500	14,000	8,500	54,000	36,000	22,500	18,000	9,000	5,500
	S1	UL	142,000	76,000	34,000	56,000	34,000	216,000	144,000	90,000	72,000	36,000	22,000
	SM	UL	106,500	57,000	25,500	42,000	25,500	162,000	108,000	67,500	54,000	27,000	16,500

(continued)

TABLE 506.2[a, b]—continued
ALLOWABLE AREA FACTOR (A_t = NS, S1, S13R, S13D or SM, as applicable)
IN SQUARE FEET

Note: UL = Unlimited; NP = Not Permitted
For SI: 1 square foot = 0.0929 m^2.

NS = Buildings not equipped throughout with an automatic sprinkler system; S1 = Buildings a maximum of one story above grade plane equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1; SM = Buildings two or more stories above grade plane equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1; S13R = Buildings equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.2.

a. See Chapters 4 and 5 for specific exceptions to the allowable area in this chapter.
b. See Section 903.2 for the minimum thresholds for protection by an automatic sprinkler system for specific occupancies.
c. New Group H occupancies are required to be protected by an automatic sprinkler system in accordance with Section 903.2.5.
d. The NS value is only for use in evaluation of existing building area in accordance with the *Florida Building Code, Existing Building*.
e. New Group I-1 and I-3 occupancies are required to be protected by an automatic sprinkler system in accordance with Section 903.2.6. For new Group I-1 occupancies, Condition 1, see Exception 1 of Section 903.2.6.
f. New and existing Group I-2 occupancies are required to be protected by an automatic sprinkler system in accordance with Section 903.2.6 and the *Florida Fire Prevention Code*.
g. New Group I-4 occupancies see Exceptions 2 and 3 of Section 903.2.6.
h. New Group R occupancies are required to be protected by an automatic sprinkler system in accordance with Section 903.2.8.

SECTION 508
MIXED USE AND OCCUPANCY

Revise section as follows:

508.4.4.1 Construction. Required separations shall be *fire barriers* constructed in accordance with Section 707 or *horizontal assemblies* constructed in accordance with Section 711, or both, so as to completely separate adjacent occupancies. *Mass timber* elements serving as *fire barriers* or *horizontal assemblies* to separate occupancies in Type IV-B or IV-C construction shall be separated from the interior of the *building* with an *approved* thermal barrier consisting of *gypsum board* that is not less than 1/2 inch (12.7 mm) in thickness or a material that is tested in accordance with and meets the acceptance criteria of both the Temperature Transmission Fire Test and the Integrity Fire Test of NFPA 275.

Exception: The thermal barrier shall not be required on the top of horizontal assemblies serving as occupancy separations.

SECTION 509
INCIDENTAL USES

Add new section as follows:

509.4.1.1 Type IV-B and IV-C construction. Where Table 509 specifies a fire-resistance-rated separation, *mass timber* elements serving as *fire barriers* or *horizontal assemblies* in Type IV-B or IV-C construction shall be separated from the interior of the incidental use with an *approved* thermal barrier consisting of *gypsum board* that is not less than 1/2 inch (12.7mm) in thickness or a material that is tested in accordance with and meets the acceptance criteria of both the Temperature Transmission Fire Test and the Integrity Fire Test of NFPA 275.

Exception: The thermal barrier shall not be required on the top of horizontal assemblies serving as incidental use separations.

CHAPTER 14
EXTERIOR WALLS

SECTION 1405
INSTALLATION OF WALL COVERINGS

Revise section as follows:

1405.5 Wood Veneers. Wood veneers on exterior walls of buildings of Type I, II, III and IV-HT construction shall be not less than 1 inch (25mm) nominal thickness, 0.438-inch (11.1 mm) exterior *hardboard* siding or 0.375-inch (9.5 mm) exterior-type *wood structural panels* or *particleboard* and shall conform to the following:

1. The *veneer* shall not exceed 40 feet (12 190 mm) in height above grade. Where *fire-retardant-treated wood* is used, the height shall not exceed 60 feet (18 290 mm) in height above grade.

2. The *veneer* is attached to or furred from a noncombustible *backing* that is fire-resistance rated as required by other provisions of this code.

3. Where open or spaced wood *veneers* (without concealed spaces) are used, they shall not project more than 24 inches (610 mm) from the *building* wall.

SECTION 1406
COMBUSTIBLE MATERIALS ON THE EXTERIOR SIDE OF EXTERIOR WALLS

Revise sections as follows:

1406.2.1 Type I, II, III and IV-HT construction. On buildings of Type I, II, III and IV-HT construction, exterior wall coverings shall be permitted to be constructed of combustible materials, complying with the following limitations:

1. Combustible exterior wall coverings shall not exceed 10 percent of an exterior wall surface area where the fire separation distance is 5 feet (1524 mm) or less.
2. Combustible exterior wall coverings shall be limited to 40 feet (12 192 mm) in height above grade plane.
3. Combustible exterior wall coverings constructed of fire-retardant-treated wood complying with Section 2303.2 for exterior installation shall not be limited in wall surface area where the fire separation distance is 5 feet (1524 mm) or less and shall be permitted up to 60 feet (18 288 mm) in height above grade plane regardless of the fire separation distance.
4. Wood veneers shall comply with Section 1405.5.

1406.3 Balconies and similar projections. Balconies and similar projections of combustible construction other than *fire-retardant-treated wood* shall be *fire-resistance* rated where required by Table 601 for floor construction or shall be of heavy timber construction in accordance with Section 2304.11. The aggregate length of the projections shall not exceed 50 percent of the *building*'s perimeter on each floor.

Exceptions:

1. On *buildings* of Type I and II construction, three *stories* or less above *grade plane*, *fire-retardant-treated wood* shall be permitted for balconies, porches, decks and exterior *stairways* not used as required *exits*.
2. Untreated *wood, and plastic composites* that comply with ASTM D7032 and Section 2612, are permitted for pickets and rails or similar guard devices that are limited to 42 inches (1067 mm) in height.
3. Balconies and similar projections on *buildings* of Type III, IV-HT and V construction shall be permitted to be of Type V construction, and shall not be required to have a *fire-resistance rating* where sprinkler protection is extended to these areas.
4. Where sprinkler protection is extended to the balcony areas, the aggregate length of the balcony on each floor shall not be limited.

CHAPTER 31
SPECIAL CONSTRUCTION

SECTION 3102
MEMBRANE STRUCTURES

Revise sections as follows:

3102.3 Type of construction. *Noncombustible membrane structures* shall be classified as Type IIB construction. Noncombustible frame or cable-supported *structures* covered by an *approved membrane* in accordance with Section 3102.3.1 shall be classified as Type IIB construction. Heavy timber frame-supported *structures* covered by an *approved membrane* in accordance with Section 3102.3.1 shall be classified as Type IV-HT construction. Other *membrane structures* shall be classified as Type V construction.

> **Exception**: Plastic less than 30 feet (9144 mm) above any floor used in *greenhouses*, where *occupancy* by the general public is not authorized, and for aquaculture pond covers is not required to meet the fire propagation performance criteria of Test Method 1 or Test Method 2, as appropriate, of NFPA 701.

3102.6.1.1 Membrane. A *membrane* meeting the fire propagation performance criteria of Test Method 1 or Test Method 2, as appropriate, of NFPA 701 shall be permitted to be used as the roof or as a *skylight* on buildings of Type IIB, III, IV-HT and V construction, provided the *membrane* is not less than 20 feet (6096 mm) above any floor, balcony or gallery.

CHAPTER 35
REFERENCED STANDARDS

Revise or add references as follows:

AISI S220—20	**North American Standard for Cold-formed Steel Framing-Nonstructural Members**, 2020 Edition 722.7.2.1
ANSI/APA PRG 320-2019	**Standard for Performance-Rated Cross-Laminated Timber** 602.4
ASTM C920—18	**Standard for Specification for Elastomeric Joint Sealants** 703.9
ASTM C1002—20	**Specification for Steel Self-Piercing Tapping Screws for the Application of Gypsum Panel Products or Metal Plaster Bases to Wood Studs or Steel Studs** 722.7.2.2
ASTM D3498—19a	**Standard Specifications for Adhesives for Field-Gluing Wood Structural Panels (Plywood or Oriented Strand Board) to Wood Based Floor Systems** 703.9
ASTM D7032—21	**Standard Specification for Establishing Performance Ratings for Wood-Plastic Composite and Plastic Lumber Deck Boards, Stair Treads, Guards and Handrails** 703.9, 705.2.3.1
ASTM E84—21a	**Standard Test Methods for Surface Burning Characteristics of Building Materials** 202, 602.4.1.1, 602.4.2.1, 602.4.3.1,
ASTM E119—20	**Standard Test Methods for Fire Tests of Building Construction and Materials** 703.8
ASTM E1354—17	**Standard Test Method for Heat and Visible Smoke Release Rates for Materials and Products using an Oxygen Consumption Calorimeter** 602.4.1.1, 602.4.2.1, 602.4.3.1
NFPA 241—22	**Standard for Safeguarding Construction, Alteration and Demolition Operations** 3301.1, 3303.2
NFPA 275—22	**Standard Method of Fire Tests for the Evaluation of Thermal Barriers** 508.4.4.1, 509.4.1
NFPA 701—23	**Standard Methods of Fire Tests for Flame Propagation of Textiles and Films** 3102.3, 3102.6.1.1
UL 263—11	**Fire Tests of Building Construction and Materials – with Revisions through August 2021** 703.8
UL 723—18	**Standard for Test for Surface Burning Characteristics of Building Materials** 602.4.1.1, 602.4.2.1, 602.4.3.1

APPENDIX D
FIRE DISTRICTS

SECTION D102
BUILDING RESTRICTIONS

Revise section as follows:

D102.2.5 Structural fire rating. Walls, floors, roofs and their supporting structural members shall be a minimum of 1-hour fire-resistance-rated construction.

Exceptions:

1. Buildings of Type IV-HT construction.
2. Buildings equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1.
3. Automobile parking structures.
4. Buildings surrounded on all sides by a permanently open space of not less than 30 feet (9144 mm).
5. Partitions complying with Section 603.1, Item 11.

FBC – Mass Timber Summary

BACKGROUND

The **Ad Hoc Committee on Tall Wood Buildings (TWB)** was created by the ICC Board in 2015 to explore the science of tall wood buildings and develop code changes for such structures.

The TWB and its various working groups (WGs) held meetings, studied issues, and sought input from expert sources worldwide. The TWB posted these documents and input on its website for interested parties to follow its progress and allow public input throughout.

At its first meeting, the TWB discussed **several performance objectives** to be met with the proposed criteria for tall wood buildings:

- **No collapse** under reasonable scenarios of complete burnout of fuel without considering automatic sprinkler protection.
- **No unusually high radiation exposure** from the subject building to adjoining properties that could present a risk of ignition under reasonably severe fire scenarios.
- **No unusual response to typical radiation exposure** from adjacent properties that could present a risk of ignition of the subject building under reasonably severe fire scenarios.
- **No unusual fire department access issues.**
- **Egress systems** designed to protect building occupants during the design escape time, plus a factor of safety.
- **Highly reliable fire suppression systems** to reduce the risk of failure during reasonably expected fire scenarios. The degree of reliability should be proportional to evacuation time (height) and the risk of collapse.

The comprehensive package of proposals from the **TWB meets these performance objectives.**

DEFINITIONS

Included in the proposal are three new or revised definitions: **Wall, Load-Bearing; Mass Timber;** and **Noncombustible Protection (for Mass Timber).** These definitions are important for understanding the proposed changes to Type IV Construction.

Load-Bearing Wall

The modification to the term **"load-bearing wall"** has been updated to include **"mass timber"** as a category equivalent to other materials. Based on research conducted by wood trade associations, **mass timber walls** (e.g., sawn, glued-laminated, cross-laminated timbers) have the ability to support the minimum 200 pounds per linear foot vertical load requirement required of "load bearing".

Mass Timber

The term **"mass timber"** already exists undefined in previous editions of the Florida Building Code (FBC). The definition proposed represents both legacy heavy timber (a.k.a. Type IV construction) and the three new construction types proposed for **FBC Chapter 6**. The purpose of defining this term is to establish that the term represents various sawn and engineered timber products referenced in **FBC Chapter 23 (Wood)** and PRG-320 "Standard for Performance-Rated Cross-Laminated Timber."

Noncombustible Protection (For Mass Timber)

The definition of **"Noncombustible Protection (For Mass Timber)"** was created to address the **passive fire protection** requirement of mass timber.

- Mass timber is permitted to have its **own fire-resistance rating** (e.g., Mass Timber only) and/or have a fire-resistance rating based on **a combination of mass timber fire resistance plus protection by noncombustible materials**, as defined in **Section 703.5** (e.g., additional materials that delay combustion, such as gypsum board).
- While it is uncommon to list a code section number within a definition, it was necessary in this case to ensure that the user understands the intent.
- Protection by a **noncombustible material** will act to **delay the combustion** of mass timber.

TYPES OF CONSTRUCTION

The committee recognized tall mass timber buildings worldwide generally fall into three categories:

1. **Fully Protected Mass Timber** – The mass timber is fully protected by noncombustible materials.
2. **Partially Exposed Mass Timber** – Some portions of mass timber may be exposed in limited amounts on walls and/or ceilings.
3. **Unprotected Mass Timber** – The mass timber structure may be fully exposed.

The **TWB** determined that fire testing was necessary to validate these concepts. During its first meeting, members discussed the nature and intent of fire testing to ensure meaningful results for the TWB and, more specifically, for the fire service. A test plan was subsequently developed, consisting of one-bedroom apartments on two levels, each with a corridor leading to a stairway. The purpose of the tests was to evaluate the contribution of mass timber to a fire, the performance of connections and joints, and conditions for responding fire personnel.

The **Fire WG** refined the test plan, which was implemented in a series of five full-scale, multi-story building tests at the **ATF laboratories** in Beltsville, MD. The results, along with testing conducted by others, helped form the basis for the **Codes WG** to develop its code change proposals, including this one, which was approved by the TWB.

MASS TIMBER CONSTRUCTION CLASSIFICATIONS

Type IV-A: Fully Protected Mass Timber

Type IV-A is completely protected with noncombustible materials, primarily layers of **5/8-inch Type X gypsum board**. Fire tests have shown that mass timber construction protected in this way can survive a complete burnout of a residential fuel load **without engaging the mass timber in the fire**.

To ensure uniform protection, the text clearly requires **all** building elements to be protected, including floor surfaces, walls and ceiling surfaces, interior roof surfaces, underside of floor surfaces, and shafts.

Type IV-A is designed to have **the same fire resistance rating as Type I-A construction**, requiring **2-hour and 3-hour structural elements**. The fire resistance rating of structural elements was set conservatively to **sustain fuel loads without sprinkler protection** and **without contributing structural members to the fire**, similar to the IBC strategy for Type I construction.

Type IV-B: Partially Exposed Mass Timber

Type IV-B allows for some exposed **wood surfaces** on ceilings, walls, columns, and beams. However, the amount of exposed wood is **limited** to restrict potential contribution to an interior fire.

Type IV-B has undergone the same fire tests as Type IV-A. Results show a predictable char layer develops on mass timber, similar to traditional sawn lumber, provided **substantial delamination is avoided**. While portions of mass timber may be unprotected, concealed spaces, shafts, and other specified areas must **be fully protected** with noncombustible materials.

Type IV-B is designed to have **the same base fire resistance requirements as Type I-B construction**, and therefore requires **2-hour structural elements**. Unlike Type I-B, the IBC allowance to reduce structural elements to 1-hour protection **is not proposed for Type IV-B**.

Type IV-C: Fully Exposed Mass Timber

Type IV-C construction allows **fully exposed mass timber**, with the key restrictions that concealed spaces, shafts, elevator hoistways, and interior exit stairway enclosures must be protected with noncombustible materials.

This construction type is different from traditional **Heavy Timber (Type IV-HT)** because **Type IV-C requires a 2-hour fire rating**. However, despite this added fire rating, the **height in feet for Type IV-C remains the same as Type IV-HT**. The committee proposed **additional floors** for some occupancy groups in Type IV-C construction.

Modifications to Tables 601 and 602

This proposal includes **modifications to Tables 601 and 602** to set performance requirements for mass timber construction, aligning them with **Type I construction standards**:

- **Type IV-A → Same fire resistance ratings as Type I-A**
- **Type IV-B → Same fire resistance ratings as Type I-B**
- **Type IV-C → Fire resistance is achieved solely through mass timber**

Because **Type IV-C lacks a direct counterpart in Type I construction**, its fire resistance ratings were set to **match those of Type IV-B**. As a result, permitted building heights for Type IV-C are **significantly reduced** in both feet and stories, as reflected in proposed changes to Tables 504.3, 504.4, and 506.2.

Rationale Statement for Proposed Modification to the Florida Building Code, 9th edition (2026)

The proposed modification seeks to incorporate provisions for the use of mass timber in the 9th edition of the Florida Building Code (FBC), aligning it with advancements in building science, fire safety, and structural integrity. This proposal is supported by thousands of hours of research, rigorous fire and structural testing, and extensive modeling by national and international experts and researchers, including the ICC Ad Hoc Committee on Tall Wood Buildings (TWB).

The TWB was established in 2015 in response to concerns from code officials regarding mass timber buildings being constructed without the benefit of codified regulations – precisely the situation in Florida today. To ensure the appropriate degree of rigor, the TWB was composed of a balanced group of stakeholders and subject matter experts to investigate and evaluate the feasibility of tall wood construction and develop comprehensive code provisions addressing fire and life safety concerns. The result was a package of code changes that were successfully integrated into the 2021 International Building Code (IBC), followed by refinements in the 2024 IBC. These provisions now form the foundation for the safe and consistent use of mass timber in 40 states and counting.

Recognizing the critical importance of consistent regulatory frameworks, national consensus codes – including the IBC and NFPA standards – have incorporated mass timber as a safe and viable construction method. The National Association of State Fire Marshals (NASFM) reaffirmed this in a November 2022 position statement, emphasizing:

> "The use of approved mass timber in tall-wood building construction is of the highest concern to NASFM as we stand for the safety of citizens and firefighters. This identified material and construction type has most recently been evaluated in the model code community. **Many facts have been discovered through independent research and testing that have validated this method as meeting the technical requirements of the codes.**" [Emphasis added]

Similarly, the International Association of Fire Chiefs (IAFC) urged jurisdictions to adopt the mass timber provisions of the IBC, stating in January 2020:

> [The IAFC] "Urge communities who are considering new mass-timber buildings to utilize the code provisions found in the 2021 ICC Code documents. There are many opportunities for consideration of buildings that may be taller, larger, or without the protection that was studied. **Communities should continue to use the codes and standards that were established through the model code development process.**" [emphasis added]

Mass timber construction is expanding rapidly across the United States, including in Florida, as developers and architects seek sustainable, efficient, and cost-effective building solutions. However, Florida currently lacks codified mass timber provisions, creating regulatory uncertainty and enforcement challenges for building and fire code officials.

To address this gap, the American Wood Council (AWC) developed the Mass Timber AMM Guide to assist with the 8th edition of the Florida Building Code. This guide, based on the 2024 IBC, provided

for membership by the Building Officials Association of Florida (BOAF) and additionally available from the AWC, provides essential guidance on mass timber construction. However, because the guide does not carry the force of law, formal adoption of mass timber provisions in the Florida Building Code remains necessary to ensure consistent regulation and enforcement across jurisdictions, provide clarity and uniformity for building and fire code officials, streamline the permitting and inspection processes, and maintain the highest standards of fire and life safety.

By adopting these provisions into the Florida Building Code, Florida will:

1. **Ensure Regulatory Alignment** – Maintain consistency with the latest national model codes and standards, facilitating uniformity and a predictable regulatory environment for developers, architects, engineers, and code officials across jurisdictions.
2. **Enhance Sustainability** – Include an additional construction option utilizing renewable materials, contributing to lower embodied carbon for a more sustainable built environment.
3. **Promote Economic Growth** – Enable innovative construction methods that reduce costs and reduce construction timelines, benefiting both the public and private sectors with projected stimulation of Florida's forestry and manufacturing industries.
4. **Strengthen Regulatory Consistency** – Provide clear and uniform guidelines for building and fire code officials, ensuring efficient enforcement of mass timber provisions across the state.
5. **Maintain Fire and Life Safety** – Ensure the adoption of mass timber includes the rigorous safety measures developed through extensive research and code development, in alignment with the positions of NASFM and the IAFC.

The Need for Action:

Mass Timber buildings are currently being constructed in Florida without the benefit of codified requirements, leaving building and fire code officials without the necessary framework to regulate these structures consistently and safely. Failing to adopt these provisions risks creating a patchwork of enforcement and inconsistent safety standards.

It is critical that Florida act now to provide a building code that will ensure that all mass timber buildings meet the highest standards of fire and life safety by adopting the proposed modifications.

For more information:

For more information, the following resources provide technical, regulatory, and real-world evidence demonstrating the safety, reliability, and benefits of tall mass timber construction:

- **ICC Ad Hoc Committee on Tall Wood Buildings**: This committee was established to explore the building science of tall wood buildings and develop related code changes. iccsafe.org
    - https://www.iccsafe.org/products-and-services/i-codes/code-development/cs/icc-ad-hoc-committee-on-tall-wood-buildings/
        - Note: The "Meeting Minutes and Documents" and "Resource Documents" sections of the committee webpage above contain the extensive research and technical information reviewed by the ad hoc committee, including original rationale statements for each proposed section.
        - Based on comprehensive analysis of this information, the committee developed a set of proposals that were adopted to establish regulations that were determined to effectively address fire and life safety considerations for tall mass timber buildings.
- **Understanding the Tall Mass Timber Code Changes**: A guide detailing the code changes approved by the ICC Ad Hoc Committee on Tall Wood Buildings, offering insights into the technical requirements and safety considerations for mass timber construction.
    - For Building Code Officials: https://awc.org/wp-content/uploads/2023/11/MTCC-Guide-Print-20180919.pdf
    - For Fire Code Officials: https://awc.org/wp-content/uploads/2022/01/tmt_toolkit.pdf
- **TMT Fire Testing:** A catalog of research and testing on the fire resistance and safety of mass timber components and structures, including related literature and fire test videos. awc.org
    - https://awc.org/woodaware/tmt-fire-testing/
- **Position Statements:**
    - International Association of Fire Chiefs (IAFC): www.iafc.org/about-iafc/positions/position/tall-wood-mass-timber-buildings
    - National Association of State Fire Marshals (NASFM): www.firemarshals.org/NASFM-Documents (on list at bottom of page)