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April 24, 2016

Doug Buck, Director Governmental Affairs
2600 Centennial Place
Tallahassee, Florida 32308

Subject: Report on Florida Building Commission Technical Advisory Committee (TAC) Meetings

Dear Mr. Buck:

I am pleased to report we were relatively successful at the recent Florida Building Commission (FBC) Technical Advisory Committee (TAC) meetings held at Tallahassee and Gainesville, Florida. I believe there are a number of items we should pursue with public comment in the second round of hearings which I have identified in the following matrix.

Going forward, the Commission staff is scheduled to have the results of the hearings posted on the Building Code Information System website (BCIS at www.floridabuilding.org) by May 6, 2016. They may have the results posted earlier, and when posted the second forty-five-day Public comment period on the TAC recommendations will commence. At the end of the public comment period the TACs will convene again to consider public comments on their recommendations.

The second round of TAC hearings to consider Public comments on TAC recommendations is currently scheduled for July 18-21, 2016, at Gainesville, Florida, but this is subject to change depending on the date of posting. Due to hotel arrangements, I do not believe this will change, but it has changed in past cycles. I will notify you of any changes in the dates. I will be monitoring the BCIS for any Public comments of interest and will notify you if any are received. In addition to on-line Public comment, a member of the public could come to the second hearing and oppose or support TAC recommendations with oral testimony. The TAC may uphold the first hearing recommendations, modify the recommendations, or reverse the recommendations. I will be in attendance at the second round of TAC hearings to represent industry interests.

Once the second round of TAC hearings is completed, the schedule calls for the TAC consideration of Public comments to be posted by August 1, 2016. The TAC recommendations will be heard by the full Florida Building Commission (Commission) in Rule Development Workshops scheduled to be conducted August 18-19, 2016, at Fort Lauderdale, Florida. This will be another opportunity for the public or a Commissioner to provide testimony in opposition to TAC recommendations. The Commission will start with a consent agenda and motion to approve the consent agenda which consists of the TAC recommendations on the proposed changes. Any Commissioner may pull items from the consent agenda for individual discussion. Depending on action at the second round of TAC hearings, with your assistance I will request a Commissioner remove those items for which we oppose the TAC recommendation from the consent agenda to allow us to make our case to the full Commission. I will be present at the Commission meetings to represent industry interests.

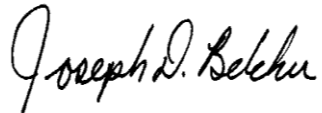
Once the Rule Development Workshops are completed, the current Commission Work Plan calls for staff to post a Draft Florida Building Code, 6th Edition (2017), on the BCIS by September 19, 2016. I will review the Draft when posted to make certain industry interests are properly represented. At that time the

supplements with the changes will be provided to ICC for integration into the 2015 I-Codes. An integrated Draft of the Florida Building Code, 6th Edition (2017) is scheduled to be posted on the BCIS by April 21, 2017. I will review the integrated Draft to make certain industry interests are properly represented.

A Final Rule Hearing on the FBC, 6th Edition (2017), will be conducted by the Commission on June 8, 2017, at which hearing the Commission will approve the final version of the code. The scheduled effective date of the code is December 31, 2017. I will be present at the Commission meeting to make certain industry interests are properly represented.

Should you have any questions, need further information, or wish to discuss these or any other matters, please do not hesitate to contact me at your earliest convenience.

Respectfully.

A handwritten signature in black ink that reads "Joseph D. Belcher". The signature is written in a cursive style with a large initial "J".

Joseph D. Belcher, Code Consultant
JDB Code Services, Inc.

Mod and Vote ¹	Impact	Discussion
Mods Submitted on Behalf of FHBA		
F6799 ² NAR 5-3	Delete Tables R302.1(1) and R302.1(2) and add Table R302.1	<p>Reasons given for a No Affirmative Recommendation vote were that the Mod: 1. does not meet the legal standing under the requirements for strengthening or equivalency of the code; 2. degrades the effectiveness and eliminates an alternative that provides greater level of protection; and, 3. is not technically justified. The suggestion was made to limit the change to existing platted subdivisions and two TAC members stated they would support the Mod with such a limit (Apfelbeck and Bahadori). It was explained that the Mod basically implemented what was enacted in Chapter 2016-129 (HB535), but there seems to be a belief that the bill applies solely to the FBC, 5th Edition, and not the FBC, 6th Edition.</p> <p>While the code consultant does not believe we can reverse the recommendation of the TAC, I recommend the submission of a public comment for the second TAC hearing. I further recommend we begin preparation to make a strong appearance by members before the full Florida Building Commission at the scheduled August 18-19, 2016, meetings at Fort Lauderdale to overturn the TAC recommendation.</p>

¹ The Commission and TACs are permitted to vote approved or approved as modified. Due to the wording in the statute, they are not permitted to disapprove a proposal. Legal counsel established it was permissible to do a vote for a Negative Affirmative Recommendation (NAR) which is essentially a vote for disapproval. In many cases, the TAC provides guidance to the proponent for crafting a Public comment for the second round of hearings which will make the change acceptable. Regarding voting, a 75% majority is required for passage of any motion.

² The letter designator indicates which TAC heard the Modification (Mod): CA = Code Administration; EN = Energy; F = Fire; M = Mechanical; P = Plumbing; S = Structural; SP = Special Occupancy.

Mod and Vote ¹	Impact	Discussion
<p>F6801 NAR 1-7</p>	<p>Modify measurement for determining where guards are required. The Mod deleted the 36" horizontal requirements. (NAHB)³</p>	<p>The TAC stated there was no Florida specific need. One TAC member (Apfelbeck) suggested a ridiculous scenario that no builder would build as part of the justification for disapproval.</p> <p>I recommend we contact NHBA for additional information as this was one of the changes NHBA suggested state associations pursue when adopting the 2015 I-Code. Recommend submission of a public comment.</p>
<p>F6802 NAR 1-7</p>	<p>Modify window fall protection provisions.</p>	<p>The TAC stated there was no Florida specific need. One TAC member (Apfelbeck) stated studies demonstrating justification including data and science is needed. Schiffer suggested changing 24-inch dimension to 36-inch to agree with building code and providing a reference to ASTM F2090. The change as proposed deleted all reference to dimensions and did reference ASTM F2090</p> <p>Research indicates there were an estimated 98.415 children (95% confidence level) treated in US hospitals for window fall-related injuries from 1990 to 20084. Florida specific data could not be found. The cost of providing fall protection is estimated at \$11.00. Due to the nature of injuries and the age of the injured accounting for the majority of the falls (0 to 4 years of age 64.8%), I recommend we not pursue this change further.</p>

3 Impact statements followed by (NAHB) indicate changes that were suggested to states adopting the 2015 I-Codes by NAHB.

4 Vaughn A. Harris, BS, Lynne M. Rochette, PhD, and Gary A. Smith, MD, Dr. PH; PEDIATRICS Volume 128, Number 3; *Pediatric Injuries Attributable to Falls from Windows in the United States in 1990 –2008*, September 2011.

Mod and Vote ¹	Impact	Discussion
F6803 AS 8-0	Modify wall height requirements for mezzanines; Add P2904 sprinkler system	
EN6805 NAR 1-6	Adds definition for Projection Factor; Adds new section addressing projection factor for residential construction. (NAHB)	<p>The TAC stated there was no Florida specific need for the change. The reason for denial is considered non-persuasive as shading is allowed for commercial structures. When large permanent projections shade a window or glass door there is no reason to not allow credit for the energy savings in decreased solar heat gain through the glass. When asked for guidance as to what may make the change acceptable, a TAC member stated a change in the factors used may make the provisions acceptable.</p> <p>The code consultant is working with a TAC member, the AAMA representative, and others to determine acceptable factors. Recommend submission of a public comment incorporating ASHRAE 90.1-2013 Shading Factors.</p>
EN6806 NAR 4-3	Permit air leakage testing of low-rise R-2 as permitted for commercial. (NAHB)	<p>The reason for disapproval given by the TAC was the provisions are not enforceable and that ASHRAE Standards require tests for zones in AC units. In addition, the FSEC representative testified in opposition stating the proposal does not address “pollution between units.” When queried regarding the fact that the code allows such testing for a four story apartment or greater multi-family building, but not a 1 to 3 story building, there was no response.</p> <p>The code consultant will research ASHRE requirements and the FBC-EC provisions for commercial buildings and recommend a public comment addressing this issue.</p>

Mod and Vote ¹	Impact	Discussion
S6807 AS 11-0	Add definition for Decorative Cementitious Finish.	
F6809 AS 7-1	Retain Florida specific amendment allowing exterior door to swing over step down.	One TAC member (Holland) voted no. Stated he was concerned person on step could be struck by opening door.
F6810 AS 7-1	Adds exception to requirement for landing at exterior doors other than egress door.	One TAC member (Holland) voted no. Stated he was concerned person on step could be struck by opening door.
F6808 AS 8-0	Allow Class 0 or Class 1 duct board for dwelling/garage penetration.	
F6811 AS 7-1	Add reference to R311.3 for exterior door step down provisions applicable to landings for stairways.	One TAC member (Holland) voted no. Stated he was concerned person on step could be struck by opening door.
S6812 (FBC-B) NAR 1-10	Adds provisions for custom one-of-a-kind doors.	There was considerable opposition to this provision which has been in the code since the inception. Testifying in opposition was Fenestration Manufacturers Association. American Architectural Manufacturers Association, World Mill Association, and an impact door manufacturer from the HVHZ. Apparently, there have been serious abuses of the provisions in the field. I believe we have

Mod and Vote ¹	Impact	Discussion
S6813 (FBC-R) NAR 1-10		<p>worked the main issues out amongst the stakeholders by requiring components to meet ANSI/WMA 100. The code consultant has not had the opportunity to review the standard as yet, but the TAC recommended approval of adoption of the standard on Mod S6478.</p> <p>Assuming the standard is acceptable, the code consultant recommends submission of a public comment requiring substitute door hardware components to meet the provisions of ANSI/W<A 100.</p>
S6814 (FBC-R) NAR 0-10 S6815 (FBC-B) NAR 0-10	Adds provisions allowing interchanging of door components.	<p>There was considerable opposition to this provision which has been in the code since the inception. Testifying in opposition was Fenestration Manufacturers Association. American Architectural Manufacturers Association, World Mill Association, and an impact door manufacturer from the HVHZ. Apparently, there have been serious abuses of the provisions in the field. I believe we have worked the main issues out amongst the stakeholders by requiring component hardware to meet the provisions of WD The suggestion is to change the language to require signed and sealed documents to ensure the design is truly one-of-a-kind.</p> <p>The code consultant recommends submission of a public comment requiring a rational analysis and signed and sealed documentation that the custom one-of-a-kind door meets the code requirements.</p>
M6816 AS 7-0	Adds reference to AHU in attics in FBC-EC.	

Mod and Vote ¹	Impact	Discussion
P6817 (FBC-R) Withdrawn for P6419 (FBC-R)	Adds Exceptions for shower liners.	The code consultant withdrew the change submitted for FHBA based on previous approval of P6419 by Gary Kozan, which addressed the same issues.
P6818 (FBC-B) Withdrawn for P6818 (FBC-B)	Adds Exceptions for shower liners.	The code consultant withdrew the change submitted for FHBA based on previous approval of P6818 by Gary Kozan, which addressed the same issues.
M6819 AS 7-0	Reduce air changes triggering whole house mechanical ventilation from 5 ACH to less than 3 ACH.	
EN6820 AS 7-0	Increase air leakage rate criteria from 5 ACH to 7 ACH.	
EN6821 Withdrawn for EN6920 NAR 0-7	Modify air leakage rate for Standard Reference Design.	After discussion with Arlene Stewart it was decided to withdraw the FHBA proposal in favor of the proposal by FSEC (Mod EN6920). Modification EN6920 was voted down 0-7 and the reason given for the NAR is not clear. The change would have increased the air leakage rate from 5 ACH to 7 ACH in the Standard Reference Design Proposed Design column of Table R405.5.2(1).

Mod and Vote ¹	Impact	Discussion
		<p>The code consultant recommends submission of a public comment to modify the table to reflect the change from 5 ACH to 7 ach approved in EN6820.</p>
<p>F6822 AM NAR 5-3 AS NAR 2-6</p>	<p>Reinstates exception for zero lot line fire separation distance; Substitutes reference to Table R302.1 for reference to Tables R302.1(1) and R302.1(2).</p>	<p>A member of the TAC suggested Approval as Modified by retaining the language shown stricken which referred to Table R302.2.1(2) for dwellings with sprinkler systems. The motion failed 5-3 (75% majority is required for approval.) A vote of 8-0 approved the request by a TAC member for reconsideration (Schock) seconded by Apfelbeck. The vote on AS submitted was NAR 3-5.</p> <p>The TAC would not recognize that the legislative mandates applied to the FBC 6th Edition. The thought was since the law specifies the FBC 5th Edition. A determination of the application of the law to the FBC 6th Edition is necessary. DBPR staff indicated they believed the statutory changes to the FBC 5th Edition would carry forward to the FBC 6th Edition.</p> <p>While the code consultant does not believe we can reverse the recommendation of the TAC, I recommend the submission of a public comment for the second TAC hearing. I further recommend we begin preparation to make a strong appearance by members before the full Florida Building Commission at the scheduled August 18-19, 2016, meetings at Fort Lauderdale to overturn the TAC recommendation.</p>
<p>F6823 AS 8-0</p>	<p>Modify definition of Fire Separation Distance to include zero lot line condition.</p>	

Mod and Vote ¹	Impact	Discussion
S6824 AS 7-0	Modify time between coats of exterior plaster from 48 hours to allow use of ASTM C 926.	
S6825 AS 10-0	Modify curing time between coats of exterior plaster from 48 hours for second coat and 7 days for finish coat to allow application of ASTM C 926 for hot humid climates.	
E7078 NAR 0-9	Removes expansion of arc fault protection to kitchen and laundry areas from code.	<p>The opposition had a burn victim appear claiming she was burned by a fire caused by sparking. Several fire marshals also testified in opposition.</p> <p>The code consultant recommends no public comment be submitted on this change.</p>
Mods of Interest to FHBA Submitted by Others		
CA6462 AS 7-1 S6462	Removes snow load and seismic exclusion from Preface.	<p>The changes were heard by both the Code Administration and the Structural TACs. The change to the Preface was submitted by Commissioner Schock. The change to Chapter 1 was submitted by DBPR Florida Building Commission staff. There was apparent confusion on the Code Administration TAC. A Commissioner (Brown) moved for a vote for reconsideration which was defeated by a 4-4</p>

Mod and Vote ¹	Impact	Discussion
NAR 0-11		<p>vote. Schock stated he had an engineer that said a high rise building he was designing in the Jacksonville area was governed by seismic loads prevailing over wind loads. There was no documentation of the design or any other factual evidence submitted. The impact to members building other than one- and two- family dwellings throughout the state would be an increase in engineering costs to comply with the requirement for designers to evaluate buildings for snow and seismic loads. It is anticipated there would be a delay in issuing permits where the submitted plans did not address snow and seismic loads.</p>
<p>CA6430 NAR 0-8 S6430 NAR 0-11</p>	<p>Adds exclusion from snow and seismic loads to Chapter 1 of FBC in mandatory language. Presently permissive statement in Preface</p>	<p>The FHBA code consultant joined the Institute for Building and Home Safety (IBHS) and others in requesting disapproval of any attempt to require broad application of snow load and seismic design requirements throughout the state. The Code Administration TAC did not agree, but the Structural TAC agreed and requested the stakeholders propose a suggested resolution to the issue. [The make-up of the Code Administration TAC is heavy with members that currently work for building departments, or formerly worked with building departments (Five members)]. Discussion is ongoing regarding application to buildings in Risk Category Groups III and IV and limiting the application to areas where the mapped short-period spectral response acceleration, S_s, is less than 0.4 g. Limitation to Risk Category III and IV buildings would not impact Group B or Group R high- or low- rise buildings. I am including Table 1604.5 from the Florida Building Code - Building which defines the Risk Categories at the end of this report.</p> <p>In discussion the IBHS representative, a structural engineer that sits on the ASCE 7 committee, states that there is no need to evaluate any buildings in Florida for seismic design and this opinion is shared by the Masonry Association of Florida Structural Engineer and the code consultant. Commissioner Schock is concerned about the seismic loading and seems amenable to restricting application to Risk Group III and IV high-rise buildings; however, we believe even this is unnecessary in Florida.</p>

Mod and Vote ¹	Impact	Discussion
		<p>It is recommended public comments be submitted in support of CA/S6462 and in support of CA/S6462. This would remove the permissive language exempting enforcement of the snow and Seismic loads from the Preface and add mandatory exemption to the code body. The PC would suggest Commissioner Schock obtain the analysis used by the engineer reporting seismic loads prevailed in the building under design to allow peer review evaluation of the methods used and the analysis.</p>
<p>E6460 NAR 3-6</p>	<p>This modification expands the requirements for the installation of lightning protection systems to all new buildings and additions, except one- and two- family dwellings per NFPA 780. It also requires the installation of surge protection devices for all normal and emergency electrical systems, except one- and two- family dwellings per NFPA 70, NEC.</p>	<p>This proposal vastly expands the requirements for lightning protection for all members building other than one- and- two- family dwellings. An exception is provided for buildings and additions evaluated by the <i>Risk Assessment Guide</i> contained in <i>NFPA 780, Standard for the Installation of Lightning Protection Systems</i> or an alternate approved by the authority having jurisdiction. The stated reason for the Electrical TAC vote of NAR was that more information and details were needed.</p> <p>The code consultant recommends close monitoring of this Mod for public comment by the proponent or others attempting to reverse the recommendation of the Electrical TAC.</p>
<p>E6498 AM Alt 3 8-1</p>	<p>Adds electrical system for existing swimming pools to the inspection requirements for permitted work on existing pools.</p>	<p>Alt 3 language: <u>Section 110.9 Existing Swimming Pools – Electrical</u></p>

Mod and Vote ¹	Impact	Discussion
F7075 AS 6-2	Exception for panic hardware on pool access gates for pools associated with multi-family complexes.	Potential impact on members building multi-family projects.
S6952 NAR 6-5	Carries forward modification to Wind Zone 4 of ASTM E 1996.	<p>The proposal has the potential to indirectly members building other than one- and two- family dwellings and townhouses less than three stories by adding more stringent provisions to the opening protection requirements than the adopted reference standards or the Florida Building Code-Residential. The TAC statement for the NAR was the change “... diminishes applicable wind requirements for protection of structures in Florida – weakens the code”. This is untrue. The provisions were accepted by Commission in the Glitch Cycle for the FBC 5th Edition. Identical provisions appear in the base code for the Florida Building Code-Residential (IRC 2015) and were put in the base code at the request of NAHB.</p> <p>The code consultant will be submitting a public comment on this Mod for another client. It is recommended the FHBA support the International Hurricane Protection Association position in this endeavor.</p>
S6914 AS 9-2	Reduces loads for rooftop structures based on ASCE 7-16.	The Mods were approved.
S6917 AS 11-0	Reduces loads for rooftop structures based on ASCE 7-16.	

Mod and Vote ¹	Impact	Discussion
S6911 NAR 0-11	Reduces loads for rooftop structures based on ASCE 7-16; Removes HVHZ provisions.	The Structural TAC voted a NAR position in favor of S6917.
F6797 AS 8-0	Adds another building as permissible termination point for horizontal exit.	Would allow recognition of elevated walkways between buildings as a horizontal exit.
R6482 AS 9-0	Retains provisions related to lightweight insulating concrete for roofing.	
SP6574 Withdrawn	Adds provisions for elevator hoistway venting.	
SP6883 NAR 0-7 S6883 NAR 0-10	Rewrites CCCL Rules.	Mod 6883 proposes to rewrite the section of the code addressing construction seaward of the Coastal Construction Control Line (CCCL). The main reasons for the rewrite given were to clarify the provisions. The proposal is in fact a major code change negatively impacting construction in the coastal areas of Florida. Under current code language there are essentially two types of flood resistance provisions, FEMA requirements and the CCCL provisions. The CCCL provisions were enacted by the Florida Legislature years ago and migrated to the code as state agency rules addressing construction when the code was created. The proposal, among other things, essentially takes the current FEMA designated A, AE, and X Flood Zones and makes them all V Zones, the most restrictive flood zone. Many uses currently permitted would be forbidden. Uses such as restaurants

Mod and Vote ¹	Impact	Discussion
		<p>and cafes, bars, shops, bath facilities, and many more that we see on the first level of coastal structures would be prohibited. The only uses that would be permitted are storage, building access, and parking. Excavations permitting sub-level parking garages would be prohibited.</p> <p>The code consultant representing the BASF High Rise Council and the Florida Home Builders Association (FHBA) presented opposition to the proposal. Upon hearing our objections, the proponent, the Department of Emergency Management requested a Negative Roll Call vote to allow the proponent and the opponents time to develop language to resolve the differences. Gene Chalecki, Program Administrator of the Department of Environmental Protection (DRP) and a member of the Special Occupancy TAC, moved for a No Affirmative Recommendation. Chalecki recommended the interested parties meet to develop alternate language to resolve the issues. The TAC voted unanimously to support the recommendation. The code consultant is working with the other organizations to make certain either acceptable language is proposed or the proposal is defeated. Chalecki further stated in conversation after the meeting that it was not the intent of DEP to prohibit current uses which are actually based on interpretations by DEP of former DEP rules which have been upheld by Declaratory Statements issued by the Florida Building Commission.</p> <p>The proponents at both TACs requested the NAR to allow resolution of issues raised by the High Rise Council. (See Update dated 04-02-2016 for further details on impact of proposal.)</p>
<p>F6973 Withdrawn</p>	<p>Adds Exception for two fire service elevators.</p>	<p>Could not adopt due to HB535 requirement for fire service elevators.</p>

Mod and Vote ¹	Impact	Discussion
EN6782 7-0	Change C405.6.3 to read the same as ASHRAE 90.1-2013 Addendum c 8.4.1 Voltage Drop. The conductors for feeders and branch circuits combined shall be sized for maximum of 5% voltage drop total.	This proposal has the potential of positively impact members building large commercial or industrial buildings. The TAC initially voted NAR 2-5 and upon discussion after a motion to reconsider by Commissioner Calleja reversed themselves to Approve as Submitted by a unanimous vote.
EN6926 AS 7-0	Deletes Florida specific amendment for U-Factor of fenestration in Climate Zone 1 to adopt base code NR for Climate Zone 1.	
EN6980 NAR 0-7	Limit prescriptive compliance glazed fenestration area as a fraction of total house conditioned area (20%).	Mod would have a negative impact on members. The code consultant will be vigilant for any public comments submitted to reverse the TAC recommendation.
EN6981 NAR 0-7	Limit prescriptive U-factor Alternative compliance glazed fenestration area as a fraction of total house conditioned area.	Mod would have a negative impact on members. The code consultant will be vigilant for any public comments submitted to reverse the TAC recommendation.

Mod and Vote ¹	Impact	Discussion
EN6982 NAR 0-7	Limit prescriptive Total UA Alternative compliance glazed fenestration area as a fraction of total house conditioned area.	Mod would have a negative impact on members. The code consultant will be vigilant for any public comments submitted to reverse the TAC recommendation.
EN6925 NAR 5-2	Deletes reductions in SHGC for shading – Commercial.	Mod would have a negative impact on members building other than one- and two- family dwellings. The code consultant will be vigilant for any public comments submitted to reverse the TAC recommendation.
EN6573 AS 7-0	Changes air leakage rate from five to seven air changes per hour; Deletes ASTM E 779 and ASTM E 1827 for testing and substitutes ANSI/RESNET/ICC 380-2016.	
EN6934 NAR 0-7	This proposal would limit the performance method by bring in prescriptive provisions.	Mod would have a negative impact on members. The code consultant will be vigilant for any public comments submitted to reverse the TAC recommendation.
EN6923 NAR 0-7	Updates the baseline efficiency assumption for air conditioning units in the performance path, consistent with federal standards.	A number of proposals such as this one create an automatic trigger based on federal action on equipment or standards. The TAC turned all “automatic trigger” proposals down because changes to the rule must be approved by the Commission; not the Department of Energy or any other governmental entity.

Mod and Vote ¹	Impact	Discussion
EN6935 NAR 0-7	Removes trade-offs for cooling, heating, and water heating equipment.	Mod would have a negative impact on members. The code consultant will be vigilant for any public comments submitted to reverse the TAC recommendation.
EN6920 NAR 0-7		After discussion with Arlene Stewart it was decided to withdraw the FHBA proposal (EN6821) in favor of the proposal by FSEC Mod EN6920. Modification EN6920 was voted down 0-7 and the reason given for the NAR is not clear. The change would have increased the air leakage rate from 5 ACH to 7 ACH in the Standard Reference Design Proposed Design column of Table R405.5.2(1). The code consultant will submit a public comment to reinstate the change requested in Mod EN6821.
EN6924 AM Alt 1 7-0	Eliminates credit for ceiling fans.	Alternate Language A-1 retains credit for ceiling fans, but requires fans used to claim credit be ENERGY STAR certified.
EN7004 NAR 3-4	Places requirement to use area averaged emittance for evaluation of attic radiant barrier systems.	Mod would have a negative impact on members. The code consultant will be vigilant for any public comments submitted to reverse the TAC recommendation.
EN6933 NAR 0-7	Mod would prohibit credit for on-site renewable power sources.	FHBA joined the Leading Builders of America and others in opposing insulation and window manufacturers on this change to the Energy Rating Index method for demonstrating energy efficiency.

Mod and Vote ¹	Impact	Discussion
		Mod would have a negative impact on members. The code consultant will be vigilant for any public comments submitted to reverse the TAC recommendation.
M6975 FBC-M NAR 0-6	Would reduce exhaust hood fan triggers for make-up air to 150 cfm and for single-family dwellings, retains 400 cfm Exception and eliminates the 400 to 800 cfm Exception.	TAC voted NAR because these provisions are established in Florida Statute.
M7017 AM A-1 6-0	Corrects existing dimensions. Alt. Language A-1 by FHBA proposed in Public Comment.	Alternate Language A-1 includes the use of Schedule 40 PVC as dryer exhaust when horizontally run beneath the slab.
M6937 FBC-R NAR 0-7	Would reduce exhaust hood fan triggers for make-up air to 150 cfm and for single-family dwellings, retains 400 cfm Exception and eliminates the 400 to 800 cfm Exception.	TAC voted NAR because these provisions are established in Florida Statute.
P6421 AS 7-0	Reinstates the traditional 5-foot head testing for DWV systems,	

Mod and Vote ¹	Impact	Discussion
	making it consistent with the Residential Code.	
P6942 AS 7-0	Modifies building sewer testing to 5-foot head, making it consistent with interior DWV testing and with IRC requirement.	
P6418 AS 7-0	Adds requirements for recessed shower compartments, and provides an exception for shower linings in such.	
P6423 AS 7-0	Provides options for thermal expansion control - as per code all editions prior to and subsequent to the 2015 IPC.	
P6667 AM 7-0	Modifies and moves Appendix F Landscape Irrigation Systems as a Chapter of the code.	
P6419	Adds requirements for recessed shower compartments, and	

Mod and Vote ¹	Impact	Discussion
AS 7-0	provides an exception for shower lining in such.	
P6420 FBC-R AS 7-0	Modifies building sewer testing to 5-foot head, making it consistent with interior DWV testing.	

**TABLE 1604.5
RISK CATEGORY OF BUILDINGS AND OTHER STRUCTURES**

RISK CATEGORY	NATURE OF OCCUPANCY
I	Buildings and other structures that represent a low hazard to human life in the event of failure, including but not limited to: <ul style="list-style-type: none"> • Agricultural facilities. • Certain temporary facilities. • Minor storage facilities. • Screen enclosures.
II	Buildings and other structures except those listed in Risk Categories I, III and IV
III	Buildings and other structures that represent a substantial hazard to human life in the event of failure, including but not limited to: <ul style="list-style-type: none"> • Buildings and other structures whose primary occupancy is public assembly with an occupant load greater than 300. • Buildings and other structures containing elementary school, secondary school or day care facilities with an occupant load greater than 250. • Buildings and other structures containing adult education facilities, such as colleges and universities, with an occupant load greater than 500. • Group I-2 occupancies with an occupant load of 50 or more resident care recipients but not having surgery or emergency treatment facilities. • Group I-3 occupancies. • Any other occupancy with an occupant load greater than 5,000^a. • Power-generating stations, water treatment facilities for potable water, waste water treatment facilities and other public utility facilities not included in Risk Category IV. • Buildings and other structures not included in Risk Category IV containing quantities of toxic or explosive materials that: <ul style="list-style-type: none"> Exceed maximum allowable quantities per control area as given in Table 307.1(1) or 307.1(2) or per outdoor control area in accordance with the <i>Florida Fire Prevention Code</i>; and Are sufficient to pose a threat to the public if released ^b.
IV	Buildings and other structures designated as essential facilities, including but not limited to: <ul style="list-style-type: none"> • Group I-2 occupancies having surgery or emergency treatment facilities. • Fire, rescue, ambulance and police stations and emergency vehicle garages. • Designated earthquake, hurricane or other emergency shelters. • Designated emergency preparedness, communications and operations centers and other facilities required for emergency response. • Power-generating stations and other public utility facilities required as emergency backup facilities for Risk Category IV structures. • Buildings and other structures containing quantities of highly toxic materials that: <ul style="list-style-type: none"> Exceed maximum allowable quantities per control area as given in Table 307.1(2) or per outdoor control area in accordance with the <i>Florida Fire Prevention Code</i>; and Are sufficient to pose a threat to the public if released ^b. • Aviation control towers, air traffic control centers and emergency aircraft hangars. • Buildings and other structures having critical national defense functions. • Water storage facilities and pump structures required to maintain water pressure for fire suppression.

a. For purposes of occupant load calculation, occupancies required by Table 1004.1.2 to use gross floor area calculations shall be permitted to use net floor areas to determine the total occupant load.

b. Where approved by the building official, the classification of buildings and other structures as Risk Category III or IV based on their quantities of toxic, highly toxic or explosive materials is permitted to be reduced to Risk Category II, provided it can be demonstrated by a hazard assessment in accordance with