PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

PART I

TRANSMIT TO:
Division of State Fire Marshal
Elijah Flowers
200 E. Gaines Street
Tallahassee, FL 32399-0342

Fax: 850/413-3731
E-mail: fire.prevention@myfloridacfo.com

DSFM USE ONLY
Log # P2-01
Date Rec'd 4/8/2025

NOTE: If you need further information on this process, please contact the Fire Prevention Bureau at 850/413-3731.

Please review the evaluation criteria (Part II) and Fiscal Impact Statement before completing this proposal. A separate submittal is required for each proposed amendment.

Type or print legibly in black ink.

Date 4/8/2025 Proponent: Carsten Jonas Tel. No. 781-363-8193

E-Mail carstenmjonas@gmail.com

Company Self

Street Address 19 Gypsy Trail

City Weston State MA Zip 02493

Organization Represented (if any) _____

Local Ordinance No. _____ Jurisdiction _____ Section/Paragraph _____

NFPA Standard No. and edition year 1 and 101 (2024) Section/Paragraph Several

Indicate One (Designate by "X" at the end of the line):
1. ☐Revise section to read:
2. ☐Add new section to read: X
3. ☐Delete section without substitution:
4. ☐Delete section and substitute the following:

Proposal (underline proposed new wording or strike-through the wording to be deleted):

See attachment.

Statement of Problem and Substantiation for Proposal (Note: State the problem that will be resolved by your recommendation; give the specific reason for your comment including copies of tests, research papers, fire experience, etc. If more that 200 words provide an abstract and describe the source document.) (Must be filled in to be considered):

See attachment.

Cjonas
Signature (Required)

Carsten Jonas
Printed Name

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

PART II

FLORIDA FIRE PREVENTION CODE	EVALUATION CRITERIA
	LOG NUMBER

The base codes for the Florida Fire Prevention Code shall be **NFPA-1, 2024** and **NFPA-101, 2024**

IMPACT (select one)	STATEWIDE: X	COUNTY:	CITY:

Describe the geographical area of impact: Statewide

1. The proposal shall identify the code section or local ordinance to be modified.
2. The proposal (Part I and Part II) along with Financial Impact Statement may be submitted electronically; however, a hard copy is required as follow-up.

Submit this evaluation with each proposed amendment.

1. How does the proposal strengthen the base code to enhance safety in Florida?

The proposal adds a new option to reduce malicious false fire alarms. Reducing false alarms enhances safety for several reasons: (a) It ensures occupants will take an alarm seriously instead of assuming it is false; and (b) It ensures that firefighters remain available to deal with real fires, not false alarms.

2. Is the proposal easy to understand and how does it contribute to a user-friendly code?

Yes, the proposal is very straightforward and clear.

3. Document the proposal's technical merit and how it is supported by a scientific basis?

The proposal is based directly on actual installations of break-glass covers in Florida and other states.

4. Describe how will the proposal be enforceable?

The proposal does not require break-glass covers, it allows them and provides criteria to meet if they are installed. The wording is designed to be very clear so that it is easily understandable by the AHJ and the building owner.

5. How does the proposal affect Florida's diverse conditions such as climate, construction and population?

The proposal would be beneficial regardless of climate, construction, or population.

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

Fiscal Impact Statement

Provide the estimated cost of the proposed amendment to the Florida Fire Prevention Code for each of the following questions. Cost data should be accompanied by a list of assumptions and support documentation.

1. Will the proposed amendment have an impact on the local entity relative to the implementation and enforcement of the proposed amendment?

_____ None

__X__ Minimal, Provide a brief explanation:

There is some extra time needed to inspect a manual fire alarm box that has a break-glass cover but it would likely take around a minute or less per unit, so any cost is minimal and may be offset by reduced false alarms.

_____ Other, Provide an explanation for estimate and methodology used:

2. Will the proposed amendment have an impact on the business/property owner relative to the cost of compliance with the proposed amendment?

_____ None

__X__ Minimal, Provide a brief explanation:

If a building owner chooses to install break-glass covers there would be a small upfront cost but there could be significant cost savings from being able to reduce false alarms and avoid business interruption.

_____ Other, Provide an explanation for estimate and methodology used:

3. Will the proposed amendment have an impact on small counties or small cities?
(A "small city" is defined by section 120.52, F.S., as any municipality that has an un-incarcerated population of 10,000 or less according to the most recent decennial census. A "small county" is defined by section 120.52, F.S., as any county that has an un-incarcerated population of 75,000 or less according to the most recent decennial census.)

__X__ No adverse impact on small cities or small counties

_____ Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

Provide a good faith estimate of the number and types of affected persons/entities:

(1) The number of individuals and entities likely to be required to comply with the rule:
None, there is no requirement for break-glass covers.

(2) A general description of the types of individuals likely to be affected by the rule:
Building owners/managers, other occupants, fire departments

(All of these are positively affected by having an effective tool to reduce false alarms)

Proposal

NFPA 1, section 13.7.1.7.7.1: Add new section as follows.

Protective covers that require a glass or other frangible element to be broken in order to activate the manual fire alarm box shall be permitted in accordance with 13.7.3.3.8.1.

NFPA 1, section 13.7.3.3.8.1: Add new section as follows.

Protective covers that require a glass or other frangible element to be broken in order to activate the manual fire alarm box shall be permitted where all of the following apply:

1. A means is provided to allow the glass or other frangible element to be broken in case of fire, without undue risk of injury.
2. A means is provided to allow authorized personnel to open the cover without breaking the glass or other frangible element.
3. When authorized personnel open the cover, the manual fire alarm box shall be capable of being reset and operationally tested without the need to disassemble or remove other components of the cover.

NFPA 101, section 9.6.2.7.1: Add new section as follows.

Protective covers that require a glass or other frangible element to be broken in order to activate the manual fire alarm box shall be permitted where all the following apply:

1. A means is provided to allow the glass or other frangible element to be broken in case of fire, without undue risk of injury.
2. A means is provided to allow authorized personnel to open the cover without breaking the glass or other frangible element.
3. When authorized personnel open the cover, the manual fire alarm box shall be capable of being reset and operationally tested without the need to disassemble or remove other components of the cover.

Statement of Problem and Substantiation for Proposal

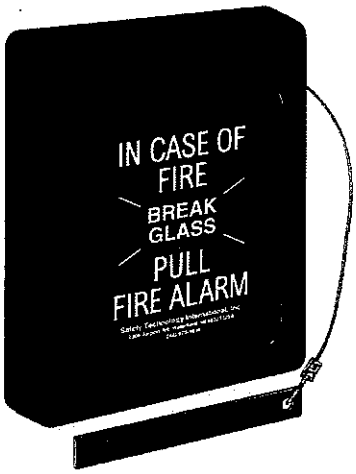
As we know, every false fire alarm means emergency response costs (and other risks, for instance, firefighters could get into an accident when responding to or returning from a false alarm), complacency by occupants (who may assume any alarm is false with potentially tragic consequences), and significant business interruption and reputational harm (on sites like TripAdvisor, there are plenty of negative reviews for hotels because of false alarms).

This proposal is intended to add a helpful tool to reduce false alarms.

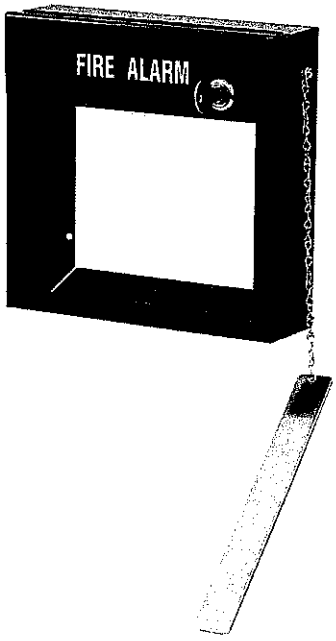
Break-glass covers are a strong, visible deterrent to malicious false alarms and have been used in some installations in Florida and other states.

However, there are currently no FFPC provisions regulating break-glass covers, which disincentivizes their use and could also lead to improper installations.

Examples of break-glass covers:



Note, the model above has a tamper-resistant screw on the bottom for authorized personnel to open the cover.



This proposal (coordinated with proposed Florida Building Code modification F11693) seeks to add code provisions regulating break-glass

covers. There is no requirement to install break-glass covers, but there are criteria to ensure that, if installed, they do not create a problem during a fire or during inspections, testing, maintenance, or drills.

This proposal has 3 requirements that must be met if break-glass covers are installed. Most, if not all, break-glass covers on the market will meet these requirements if installed properly.

1. There must be a means to break the glass in case of fire, without undue risk of injury. The examples shown above have a metal piece that is used to do this.
2. There must be a means for authorized personnel to open the cover without needing to break the glass.
3. When authorized personnel open the cover, they must be able to reset and test the manual fire alarm box, without needing to disassemble the cover any further.

In the proposal, I've used the term "glass or other frangible element" to account for the fact that some covers may use another material such as plastic.

There are differences between NFPA 1 and NFPA 101 which I've accounted for in this proposal. NFPA 1 contains additional provisions extracted from NFPA 72 that are not present in NFPA 101. For NFPA 1, I placed the new criteria as a subsection to an existing section that discusses protective covers. NFPA 101 does not contain that section, so I placed the amendment to NFPA 101 under another section. In the corresponding section in NFPA 1, a pointer is also added to point the reader in the right direction.

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

PART I

TRANSMIT TO:
Division of State Fire Marshal
Elijah Flowers
200 E. Gaines Street
Tallahassee, FL 32399-0342

Fax: 850/413-3731
E-mail: fire.prevention@myfloridacfo.com

DSFM USE ONLY
Log # P2-02
Date Rec'd 4/3/2025

NOTE: If you need further information on this process, please contact the Fire Prevention Bureau at 850/413-3731.

Please review the evaluation criteria (Part II) and Fiscal Impact Statement before completing this proposal. A separate submittal is required for each proposed amendment.

Type or print legibly in black ink.

Date 4/3/2025 Proponent: Carsten Jonas Tel. No. 781-363-8193

E-Mail carstenmjonas@gmail.com

Company Self

Street Address 19 Gypsy Trail

City Weston State MA Zip 02493

Organization Represented (if any) N/A

Local Ordinance No. N/A Jurisdiction N/A Section/Paragraph N/A

NFPA Standard No. and edition year 1 and 101 Section/Paragraph Several (see attach)

Indicate One (Designate by "X" at the end of the line):
1. ☐Revise section to read: X
2. ☐Add new section to read:
3. ☐Delete section without substitution:
4. ☐Delete section and substitute the following:

Proposal (underline proposed new wording or strike-through the wording to be deleted):

See attachment. (This proposal supersedes rejected Phase 1 proposal P1-17.)

Statement of Problem and Substantiation for Proposal (Note: State the problem that will be resolved by your recommendation; give the specific reason for your comment including copies of tests, research papers, fire experience, etc. If more that 200 words provide an abstract and describe the source document.) (Must be filled in to be considered):

See attachment.

Cjonas
Signature (Required)

Carsten Jonas
Printed Name

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

PART II

FLORIDA FIRE PREVENTION CODE	EVALUATION CRITERIA
	LOG NUMBER

The base codes for the Florida Fire Prevention Code shall be **NFPA-1, 2024** and **NFPA-101, 2024**

IMPACT (select one)	STATEWIDE: X	COUNTY:	CITY:

Describe the geographical area of impact: Statewide, but mainly areas with many
international visitors (e.g. Miami area, Orlando area)

1. The proposal shall identify the code section or local ordinance to be modified.
2. The proposal (Part I and Part II) along with Financial Impact Statement may be submitted electronically; however, a hard copy is required as follow-up.

Submit this evaluation with each proposed amendment.

1. How does the proposal strengthen the base code to enhance safety in Florida?

Including the internationally-standardized pictogram makes exit signs readily understandable regardless of the language someone speaks. Florida is one of the most popular states for international visitors to the US.

2. Is the proposal easy to understand and how does it contribute to a user-friendly code?

The proposal is no more complex than existing code language, and it makes the code more user-friendly by allowing an option statewide (by default) that is currently only allowed when approved by the AHJ, and adding size requirements for this option which are currently missing.

3. Document the proposal's technical merit and how it is supported by a scientific basis?

The internationally-standardized pictogram has been adopted in many countries around the world, including English-speaking ones like Canada, Australia, New Zealand, and the UK.

4. Describe how will the proposal be enforceable?

The requirements for exit signs that use the internationally-standardized pictogram are just as easy to enforce as the requirements for exit signs that use the word "EXIT". This proposal also adds size requirements for pictogram-based exit signs which are currently missing.

5. How does the proposal affect Florida's diverse conditions such as climate, construction and population?

This proposal is specifically intended to address Florida's international visitor population.

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

Fiscal Impact Statement

Provide the estimated cost of the proposed amendment to the Florida Fire Prevention Code for each of the following questions. Cost data should be accompanied by a list of assumptions and support documentation.

1. Will the proposed amendment have an impact on the local entity relative to the implementation and enforcement of the proposed amendment?

X None

_____Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

2. Will the proposed amendment have an impact on the business/property owner relative to the cost of compliance with the proposed amendment?

X None

_____Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

3. Will the proposed amendment have an impact on small counties or small cities?
(A "small city" is defined by section 120.52, F.S., as any municipality that has an un-incarcerated population of 10,000 or less according to the most recent decennial census. A "small county" is defined by section 120.52, F.S., as any county that has an un-incarcerated population of 75,000 or less according to the most recent decennial census.)

X No adverse impact on small cities or small counties

_____ Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

Provide a good faith estimate of the number and types of affected persons/entities:

(1) The number of individuals and entities likely to be required to comply with the rule: None due to lack of a mandate

(2) A general description of the types of individuals likely to be affected by the rule:
Owners of buildings frequented by international visitors
(e.g. theme parks, international airports) are likely to benefit from this amendment.

Proposal

NFPA 1, section 14.14.3 ("Sign Legend"): Add text to empty section as follows.

Exit signs required by 14.14.1 and 14.14.2 shall be either text-based in accordance with 14.14.3.1 or pictogram-based in accordance with 14.14.3.2. Either of the formats may be used, unless the AHJ requires one of the formats pursuant to 14.14.3.3.

NFPA 1, section 14.14.3.1: Revise as follows.

Text-based exit signs ~~Signs~~ required by 14.14.1 and 14.14.2 shall read as follows in plainly legible letters, or other appropriate wording shall be used: EXIT

NFPA 1, section 14.14.3.2: Replace as follows.

~~Where approved by the AHJ, pictograms in compliance with NFPA 170 shall be permitted.~~

Pictogram-based exit signs shall use the pictogram for an emergency exit, and as applicable, directional arrows, as specified in NFPA 170.

NFPA 1, section 14.14.3.3: Add new section.

An AHJ may enact a policy to require a text-based or pictogram-based format instead of allowing either of the formats to be used. If it does so, the AHJ shall post the policy on its public-facing website. Where the website features a page or section pertaining to policies or interpretations relating to this Code, the policy shall be posted in such section.

NFPA 1, section 14.14.6.1.1: Revise as follows.

Externally illuminated text-based signs required by 14.14.1 and 14.14.2, other than approved existing signs, unless otherwise provided in 14.14.6.1.2, shall read EXIT or shall use other appropriate wording in plainly legible letters sized as follows:

1. For new signs, the letters shall be not less than 6 in. (150 mm) high, with the principal strokes of letters not less than $^3/_4$ in. (19 mm) wide.
2. For existing signs, the required wording shall be permitted to be in plainly legible letters not less than 4 in. (100 mm) high.
3. The word EXIT shall be in letters of a width not less than 2 in. (51 mm), except the letter I, and the minimum spacing between letters shall be not less than $^3/_8$ in. (9.5 mm).
4. Sign legend elements larger than the minimum established in 14.14.6.1.1(1) through 14.14.6.1.1(3) shall use letter widths, strokes, and spacing in proportion to their height.

NFPA 1, section 14.14.6.1.3: Add new section.

Externally illuminated pictogram-based signs required by 14.14.1 and 14.14.2 shall have a green background not less than 6 in. (150 mm) high, the doorway silhouette not less than 5.4 in. (135 mm) high, and where

applicable, directional arrows not less than 3.8 in. (95.6 mm) high. This section shall not apply to marking required by 14.14.1.7.

NFPA 101, section 7.10.3 ("Sign Legend"): Add text to empty section as follows.

Exit signs required by 7.10.1 and 7.10.2 shall be either text-based in accordance with 7.10.3.1 or pictogram-based in accordance with 7.10.3.2. Either of the of formats may be used, unless the authority having jurisdiction requires one of the formats pursuant to 7.10.3.3.

NFPA 101, section 7.10.3.1: Revise as follows.

Text-based exit signs ~~Signs~~ required by 7.10.1 and 7.10.2 shall read as follows in plainly legible letters, or other appropriate wording shall be used: EXIT

NFPA 101, section 7.10.3.2: Replace as follows.

~~Where approved by the authority having jurisdiction, pictograms in compliance with NFPA 170 shall be permitted.~~

Pictogram-based exit signs shall use the pictogram for an emergency exit, and as applicable, directional arrows, as specified in NFPA 170.

NFPA 101, section 7.10.3.3: Add new section.

An authority having jurisdiction may enact a policy to require a text-based or pictogram-based format instead of allowing either of the formats to be used. If it does so, the authority having jurisdiction shall post the policy on its public-facing website. Where the website features a page or section pertaining to policies or interpretations relating to this Code, the policy shall be posted in such section.

NFPA 101, section 7.10.6.1.1: Revise as follows.

Externally illuminated text-based signs required by 7.10.1 and 7.10.2, other than approved existing signs, unless otherwise provided in 7.10.6.1.2, shall read EXIT or shall use other appropriate wording in plainly legible letters sized as follows:

1. For new signs, the letters shall be not less than 6 in. (150 mm) high, with the principal strokes of letters not less than $^{3}/_{4}$ in. (19 mm) wide.
2. For existing signs, the required wording shall be permitted to be in plainly legible letters not less than 4 in. (100 mm) high.
3. The word EXIT shall be in letters of a width not less than 2 in. (51 mm), except the letter I, and the minimum spacing between letters shall be not less than $^{3}/_{8}$ in. (9.5 mm).
4. Sign legend elements larger than the minimum established in 7.10.6.1.1(1) through 7.10.6.1.1(3) shall use letter widths, strokes, and spacing in proportion to their height.

NFPA 101, section 7.10.6.1.3: Add new section.

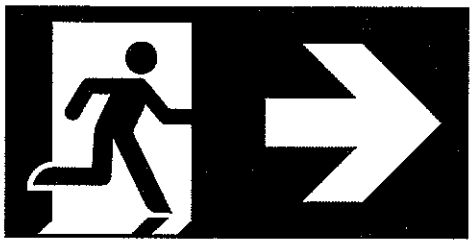
Externally illuminated pictogram-based signs required by 7.10.1 and 7.10.2 shall have a green background not less than 6 in. (150 mm) high, the doorway silhouette not less than 5.4 in. (135 mm) high, and where applicable, directional arrows not less than 3.8 in. (95.6 mm) high. This section shall not apply to marking required by 7.10.1.7.

Statement of Problem and Substantiation for Proposal

A pictogram (symbol) for exit signs is internationally-standardized and has been adopted in many countries around the world over the past several decades, including other English-speaking countries such as Canada, Australia, New Zealand, and the UK.

Including the internationally-standardized pictogram makes exit signs easily understandable by anyone regardless of the language they speak. This would be particularly beneficial in facilities where there may be many international visitors who might not speak English, such as an international airport or a theme park destination. In addition, when the internationally-standardized pictogram is used with a directional arrow, the arrow is much larger compared to the arrow on text-based exit signs (see figure 1). This enhances safety by making it easier for occupants to find the exit, especially if it's a building that they're not familiar with or for occupants with vision impairments.

Figure 1: an example of the internationally-standardized pictogram with a directional arrow.



Currently, NFPA 1 and 101 allow pictogram-based exit signs to be used instead, but only where individually approved by the AHJ. It is unclear whether or not an AHJ will approve pictogram-based exit signs until after the project is proposed, which discourages designers from using this option.

The codes also do not specify minimum heights for externally illuminated pictogram-based exit signs, they only specify minimum heights for externally illuminated text-based exit signs. (Internally illuminated exit signs, whether pictogram-based or text-based, are regulated by UL 924 as referenced by the NFPA codes.)

This proposal will allow pictogram-based exit signs to be used in all buildings, statewide, by default. Text-based exit signs will also still be allowed. By default, both formats will be equally permissible.

However, an AHJ, if it so desires, will be able to adopt a policy requiring text-based (or pictogram-based) exit signs instead of allowing either format. If the AHJ does that, it will be required to post the policy on its public-facing website (and where the website has a section pertaining to policies or interpretations relating to the FFPC, the policy will be required to be in that section so that designers can conveniently find it).

Therefore, unlike the previous version of this proposal (P1-17), an AHJ will **not** be forced to allow pictogram-based exit signs if they wish to opt out.

To be consistent with the terminology already used in the codes, this proposal uses "AHJ" in NFPA 1, and "authority having jurisdiction" in NFPA 101.

For externally illuminated pictogram-based signs, the proposal will also specify minimum heights. These heights are consistent with what is required by UL 924 (referenced by NFPA 1 section 2.3.19 and NFPA 101 section 2.3.11) for internally illuminated pictogram-based signs (known in that standard as "graphical symbol exit signs").

In addition to the FFPC, the Building part of the Florida Building Code ("FBC-Building") regulates exit signs.
FBC-Building section 1013.5 defers to UL 924 for all internally illuminated exit signs. Therefore, pictogram-based internally illuminated exit signs are already allowed by default by the FBC-Building.
FBC-Building sections 1013.6 and 1013.6.1 require externally illuminated exit signs to be text-based.
In December, I submitted FBC-Building modification F11692 to allow pictogram-based externally illuminated exit signs (there is also a proposed IBC change, E78-24, not submitted by me, which was approved at an ICC committee action hearing last year but would take longer to end up in the FBC-B). This proposal and FBC-Building modification F11692 are intended to complement each other and minimize conflicts between the FBC and FFPC.

For reference, here is what UL 924 requires for internally illuminated pictogram-based signs. These minimum heights are consistent with what this FFPC proposal specifies for externally illuminated pictogram-based signs.

Figure 42.2

Minimum dimensions for specific elements of the running man

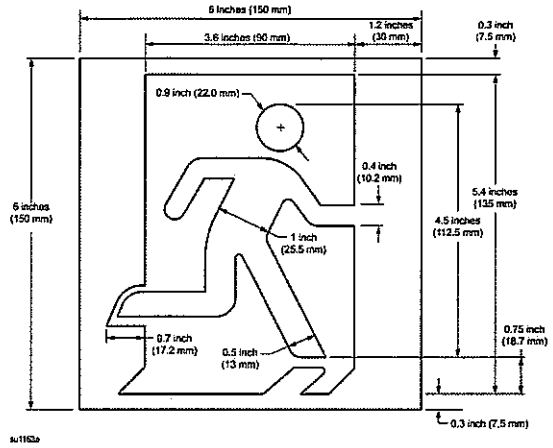
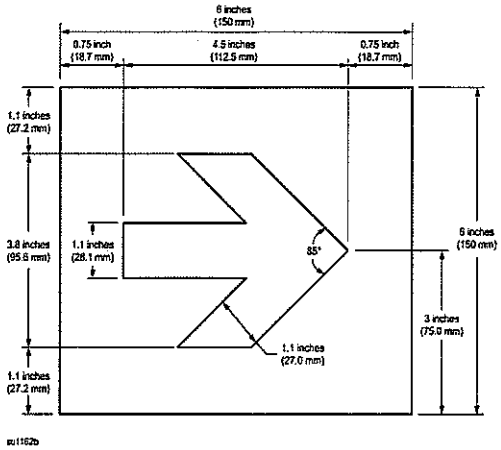


Figure 42.3

Minimum dimensions for specific elements of the arrow



Phase 2

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

PART I

TRANSMIT TO:
Division of State Fire Marshal
Elijah Flowers
200 E. Gaines Street
Tallahassee, FL 32399-0342

Fax: 850/413-3731
E-mail: fire.prevention@myfloridacfo.com

DSFM USE ONLY
Log # P2-03
Date Rec'd 4/9/2025

NOTE: If you need further information on this process, please contact the Fire Prevention Bureau at 850/413-3731.

Please review the evaluation criteria (Part II) and Fiscal Impact Statement before completing this proposal. A separate submittal is required for each proposed amendment.

Type or print legibly in black ink.

Date 4/9/25 Proponent: Tommy Demopoulos Tel. No. 954-600-6150

E-Mail tommy.demopoulos@tamarac.org

Company Tamarac Fire Rescue

Street Address 6000 Hiatus Road

City Tamarac State FL Zip 33321

Organization Represented (if any)

Local Ordinance No. Jurisdiction Section/Paragraph

NFPA Standard No. and edition year NFPA 101 2024 edition _____ Section/Paragraph 16.2.2.2.2

Indicate One (Designate by "X" at the end of the line):

1. **X** Revise section to read: X
2. □Add new section to read:
3. □Delete section without substitution:
4. □Delete section and substitute the following:

Proposal (underline proposed new wording or strike-through the wording to be deleted):

16.2.2.2.2

Any door in a required means of egress from an area having an occupant load of ~~100~~ 50 or more persons shall be permitted to be provided with a latch or lock only if the latch or lock is panic hardware or fire exit hardware complying with 7.2.1.7.

Statement of Problem and Substantiation for Proposal (Note: State the problem that will be resolved by your recommendation; give the specific reason for your comment including copies of tests, research papers, fire experience, etc. If more that 200 words provide an abstract and describe the source document.) (Must be filled in to be considered):

Florida Building Code, section 1010.2.9 require a Group A and E occupancies with 50 or more occupants be provided with panic hardware. This is a difference in the Building and Fire codes that lead to confusion by plans examiners and contractors/business owners. Since the Building Code that shows 50 persons is more stringent, then the fire code section is irrelevant as the most stringent takes precedence. Recommending both codes mirror each other.

Signature (Required)

Tommy Demopoulos
Printed Name

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

PART II

FLORIDA FIRE PREVENTION CODE	EVALUATION CRITERIA
	LOG NUMBER

The base codes for the Florida Fire Prevention Code shall be **NFPA-1, 2024** and **NFPA-101, 2024**

IMPACT (select one)	STATEWIDE: X	COUNTY:	CITY:

Describe the geographical area of impact:

1. The proposal shall identify the code section or local ordinance to be modified.
2. The proposal (Part I and Part II) along with Financial Impact Statement may be submitted electronically; however, a hard copy is required as follow-up.

Submit this evaluation with each proposed amendment.

1. How does the proposal strengthen the base code to enhance safety in Florida?

This proposal strengthens safety in Florida as it takes minimizes differences in the fire and building codes and causes less confusion for design professionals when looking at both codes. This also makes the occupancy safer as it reduces the occupancy load that requires panic hardware.

2. Is the proposal easy to understand and how does it contribute to a user-friendly code?

We believe the proposal is easy to read and user-friendly.

3. Document the proposal's technical merit and how it is supported by a scientific basis?

The existing occupant loads established are not technical or scientific based. This proposal eliminates the potential for an occupancy to not receive panic hardware when needed if a building plans examiner misses enforcing their code section.

4. Describe how will the proposal be enforceable?

It is already enforceable in the Florida Building Code and plans examiners are already enforcing the 50 occupant load

5. How does the proposal affect Florida's diverse conditions such as climate, construction and population?

The proposed language does not affect the diverse conditions in Florida.

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

Fiscal Impact Statement

Provide the estimated cost of the proposed amendment to the Florida Fire Prevention Code for each of the following questions. Cost data should be accompanied by a list of assumptions and support documentation.

1. Will the proposed amendment have an impact on the local entity relative to the implementation and enforcement of the proposed amendment?

X___ None

_____Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

2. Will the proposed amendment have an impact on the business/property owner relative to the cost of compliance with the proposed amendment?

X___ None

_____Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

3. Will the proposed amendment have an impact on small counties or small cities?
(A "small city" is defined by section 120.52, F.S., as any municipality that has an un-incarcerated population of 10,000 or less according to the most recent decennial census. A "small county" is defined by section 120.52, F.S., as any county that has an un-incarcerated population of 75,000 or less according to the most recent decennial census.)

X___ No adverse impact on small cities or small counties

_____ Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

Provide a good faith estimate of the number and types of affected persons/entities:

(1) The number of individuals and entities likely to be required to comply with the rule:

Unknown at this time.

(2) A general description of the types of individuals likely to be affected by the rule:

Educational occupancies

Phase 2

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

PART I

TRANSMIT TO:
Division of State Fire Marshal
Elijah Flowers
200 E. Gaines Street
Tallahassee, FL 32399-0342

Fax: 850/413-3731
E-mail: fire.prevention@myfloridacfo.com

DSFM USE ONLY
Log # P2-04
Date Rec'd 4/9/2025

NOTE: If you need further information on this process, please contact the Fire Prevention Bureau at 850/413-3731.

Please review the evaluation criteria (Part II) and Fiscal Impact Statement before completing this proposal. A separate submittal is required for each proposed amendment.

Type or print legibly in black ink.

Date 4/9/25 Proponent: Tommy Demopoulos Tel. No. 954-600-6150

E-Mail tommy.demopoulos@tamarac.org

Company Tamarac Fire Rescue

Street Address 6000 Hiatus Road

City Tamarac State FL Zip 33321

Organization Represented (if any) Florida Fire Marshals and Inspectors Association (FFMIA)

Local Ordinance No. Jurisdiction Section/Paragraph

NFPA Standard No. and edition year NFPA 101 2024 edition Section/Paragraph 4.7.1 & 14.7.2.5 & 15.7.2.5

Indicate One (Designate by "X" at the end of the line):

1. **XX**Revise section to read: X
2. □ Add new section to read:
3. □Delete section without substitution:
4. □Delete section and substitute the following:

Proposal (underline proposed new wording or strike-through the wording to be deleted):

4.7.1 Where required. Emergency egress, fire and relocation drills conforming to the provisions of this Code shall be conducted as specified by the provisions of Chapter 11 through 43, or by appropriate action of the authority having jurisdiction. Drills shall be designated in cooperation with the local authorities.

14.7.2.5/15.7.2.5 All ~~emergency~~ fire drill alarms shall be sounded on the fire alarm system ~~or by other methods approved by the AHJ~~. This provision shall not prohibit the use of a mass notification system, as defined in NFPA 72, for notifying and instructing occupants for drills other than fire drills.

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

Statement of Problem and Substantiation for Proposal (Note: State the problem that will be resolved by your recommendation; give the specific reason for your comment including copies of tests, research papers, fire experience, etc. If more that 200 words provide an abstract and describe the source document.) (Must be filled in to be considered):

A number of years ago, the Division of State Fire Marshal added/revised multiple sections to both Chapter 14 and 15 related to egress drills and fire drills after discussion with DOE and their revisions to F.A.C. 6A-1.0018. "Emergency drill" as defined in 6A-1.0018(2)(g) "means a method of testing emergency plans and responses to incidents **other than fire**, including active threats, natural disasters, severe weather, hazardous materials, reunification, and other critical incident scenarios". This F.A.C. further says that Fire Drills must be conducted in accordance with the FFPC.

While the alarm system may have a mass notification system, the sounding of the alarm shouldn't be used for tornado drills, active shooter drills and other non-fire emergencies, the mass notification system may be utilized as needed by the occupants or first responder.

Signature (Required)

Tommy Demopoulos
Printed Name

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

PART II

FLORIDA FIRE PREVENTION CODE	EVALUATION CRITERIA
	LOG NUMBER

The base codes for the Florida Fire Prevention Code shall be **NFPA-1, 2024** and **NFPA-101, 2024**

IMPACT (select one)	STATEWIDE: X	COUNTY:	CITY:

Describe the geographical area of impact:

1. The proposal shall identify the code section or local ordinance to be modified.
2. The proposal (Part I and Part II) along with Financial Impact Statement may be submitted electronically; however, a hard copy is required as follow-up.

Submit this evaluation with each proposed amendment.

1. How does the proposal strengthen the base code to enhance safety in Florida?

The proposal relieves confusion for school leadership and AHJ's as to if a fire alarm system should be used for "drills" within a school. This helps schools guide decision making when planning what to do or what systems to use when conducting fire alarms and other drills.

2. Is the proposal easy to understand and how does it contribute to a user-friendly code?

We believe the proposal is easy to read and user-friendly

3. Document the proposal's technical merit and how it is supported by a scientific basis?

Definitions for emergency drills and fire drills have been revised over time and as well as processes for mass notification for building occupants since active shooter instances such as MSD in Coral Springs.

4. Describe how will the proposal be enforceable?

Since this language is in the body of the code, it will be enforceable and should be provided proactively to all school leadership.

5. How does the proposal affect Florida's diverse conditions such as climate, construction and population?

The proposed language does not affect the diverse conditions in Florida.

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

Fiscal Impact Statement

Provide the estimated cost of the proposed amendment to the Florida Fire Prevention Code for each of the following questions. Cost data should be accompanied by a list of assumptions and support documentation.

1. Will the proposed amendment have an impact on the local entity relative to the implementation and enforcement of the proposed amendment?

X None

_____Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

2. Will the proposed amendment have an impact on the business/property owner relative to the cost of compliance with the proposed amendment?

X None

_____Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

3. Will the proposed amendment have an impact on small counties or small cities?
(A "small city" is defined by section 120.52, F.S., as any municipality that has an un-incarcerated population of 10,000 or less according to the most recent decennial census. A "small county" is defined by section 120.52, F.S., as any county that has an un-incarcerated population of 75,000 or less according to the most recent decennial census.)

X No adverse impact on small cities or small counties

_____ Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

Provide a good faith estimate of the number and types of affected persons/entities:

(1) The number of individuals and entities likely to be required to comply with the rule:

Currently unknown

(2) A general description of the types of individuals likely to be affected by the rule:

Schools occupancies as defined by the Life Safety Code.

Phase 2

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

ART I

TRANSMIT TO:
Division of State Fire Marshal
Elijah Flowers
200 E. Gaines Street
Tallahassee, FL 32399-0342

Fax: 850/413-3731
E-mail: fire.prevention@myfloridacfo.com

DSFM USE ONLY
Log # P2-05
Date Rec'd 4/9/2025

NOTE: If you need further information on this process, please contact the Fire Prevention Bureau at 850/413-3731.

Please review the evaluation criteria (Part II) and Fiscal Impact Statement before completing this proposal. A separate submittal is required for each proposed amendment.

Type or print legibly in black ink.

Date 4/9/25 Proponent: Tommy Demopoulos Tel. No. 954-600-6150

E-Mail tommy.demopoulos@tamarac.org

Company Tamarac Fire Rescue

Street Address 6000 Hiatus Road

City Tamarac State FL Zip 33321

Organization Represented (if any) Florida Fire Marshals and Inspectors Association (FFMIA)

Local Ordinance No. Jurisdiction Section/Paragraph

NFPA Standard No. and edition year NFPA 1 2024 edition Section/Paragraph 11.13.3

Indicate One (Designate by "X" at the end of the line):

1. □ Revise section to read:
2. **X** Add new section to read: X
3. □Delete section without substitution:
4. □Delete section and substitute the following:

Proposal (underline proposed new wording or strike-through the wording to be deleted):

Option A

11.13.3 Disconnecting Means

11.13.3.1 For permanently connected EVSE and WPTE, a disconnecting means shall be provided and installed in a readily accessible location. If the disconnecting means is installed remote from the equipment, a plaque or directory shall be installed on the equipment denoting the location of the disconnecting means. For cord- and plug-connected EVSE and WPTE, with a rating not exceeding 60 amperes or not exceeding 150 volts to ground, the cord and plug shall be permitted to serve as the disconnecting means. The disconnecting means shall be lockable open.

Option B

11.13.3 Disconnecting Means

11.13.3.1 For permanently connected EVSE and WPTE, a disconnecting means shall be provided and installed in a readily accessible location. If the disconnecting means is installed remote from the equipment, a plaque or directory shall be installed on the equipment denoting the location of the disconnecting means. For cord- and plug-connected EVSE and WPTE, with a rating not exceeding 60 amperes or not exceeding 150 volts to ground, the cord and plug shall be permitted to serve as the disconnecting means. The disconnecting means shall be lockable open.

11.13.3.2 For EVSE and WPTE installations that are within a parking structure, a means for disconnecting power to the entire system shall be installed on the exterior of the structure and on each floor where the equipment is located, in locations approved by the authority having jurisdiction and be identified with signage in accordance with 11.13.3.6.

11.13.3.3 Disconnecting means shall be approved by the authority having jurisdiction.

11.13.3.4 Disconnecting means shall be installed not more than 60 inches (1524 mm) above finished floor.

11.13.3.5 Where more than one disconnecting means is provided, all devices shall be interconnected and be a manual reset type.

11.13.3.6 A reflective, weather resistant sign shall be provided at each disconnecting means location and shall be a minimum of 16 inches (406.4 mm) by 10 inches (254 mm) in size, be visible to emergency responders, be on a green background with white lettering and state "ELECTRIC VEHICLE EMERGENCY DISCONNECT".

11.13.3.7 The disconnecting means shall be maintained and tested annually.

11.13.3.8 Where applicable, power to all EVSE and WPTE shall be disconnected upon activation of a buildings waterflow alarm.

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

Statement of Problem and Substantiation for Proposal (Note: State the problem that will be resolved by your recommendation; give the specific reason for your comment including copies of tests, research papers, fire experience, etc. If more that 200 words provide an abstract and describe the source document.) (Must be filled in to be considered):

Since the passing of SB 1084 in the 2024 legislative session, this preempts the regulation of electric vehicle charging stations to the state. While the proposed items have been heard during rulemaking workshops with the Florida Department of Agriculture and Consumer Services (FDACS), minimal language related to fire safety has been included. NFPA 70, article 625 has some items related to fire safety and disconnects, there is still much more that needs expanding on to ensure the safety of our first responders and those occupying the buildings with these charging systems installed within..

Fires in parking structures can lead to very large economic losses, as evidenced by fires in Liverpool's Echo Arena (United Kingdon 2018) and at Stavanger Airport (Norway 2020). These incidents involved hundreds of automobiles and ultimately resulted in structural collapse of the parking structure and tens of millions of dollars in losses. A large increase in the use of plastic materials has occurred in vehicle construction from the 1970's to 2018 (in western markets). The increased plastic content may lead to faster flame spread within the vehicle, easier ignition and more rapid fire spread to neighboring vehicles.

The US Fire Administration estimates about 650 parking garage fires occur annually in the U.S., causing an estimated $8 million in property damage and 15 injuries annually.

Option A of the language proposed for the disconnecting means comes from a proposal to NFPA 70, 2026 edition which is still being deliberated. Option B not only provides the proposal from NFPA 70, 2026 edition, it provides first responders a way to shut power to these systems when on each floor of a parking garage. Safest way would be to have a disconnect on the exterior of the building, but if that is blocked or missed by first responders, additional disconnects will allow responders to quickly shunt power and not have to traverse back downstairs and outside to find a shut off or send additional units away from critical tasks to locate the shut off. Since Florida law under Florida Statute 553.895(2) allows new stand-alone parking garages, meeting certain criteria to be built and omit fire sprinklers, shutting down the power to ensure firefighter safety is paramount. Firefighters need an easier way to accomplish this as much of their time will be spent pulling hose and protecting exposed vehicles to slow the spread of fire.

Additionally, NFPA 70 has a requirement for a sign but the sign states "EVSE" with no size requirements. The proposed language requires the sign to be spelled out as most firefighters don't know what EVSE means. The proposed language related to the AHJ approving the type will allow the AHJ to recommend disconnects that might already be used in their jurisdiction with the tools, equipment or keys they currently carry. These devices would be tamper proof to avoid unintentional shut off's. This proposal restricts EVSE from being installed right next to a means of egress as to not block it if that vehicle catches on fire and requires some distances to in place so that these charging stations are not placed right up against structural members and raises the potential for structural collapse.

Signature (Required)

Tommy Demopoulos
Printed Name

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

PART II

FLORIDA FIRE PREVENTION CODE	EVALUATION CRITERIA
	LOG NUMBER

The base codes for the Florida Fire Prevention Code shall be **NFPA-1, 2024** and **NFPA-101, 2024**

IMPACT (select one)	STATEWIDE: X	COUNTY:	CITY:

Describe the geographical area of impact:

1. The proposal shall identify the code section or local ordinance to be modified.
2. The proposal (Part I and Part II) along with Financial Impact Statement may be submitted electronically; however, a hard copy is required as follow-up.

Submit this evaluation with each proposed amendment.

1. How does the proposal strengthen the base code to enhance safety in Florida?

The proposal provides additional fire safety then what is currently required in national base codes, which enhances first responders tactics and strategies available to fight a fire within these structures. This enhances safety to Florida's first responders and provides uniform codes and enforcement since regulations related to these systems are preempted to the state.

2. Is the proposal easy to understand and how does it contribute to a user-friendly code?

We believe the proposal is easy to read and user-friendly

3. Document the proposal's technical merit and how it is supported by a scientific basis?

Studies prove that fire suppression systems are needed within parking structures as identified by the NFPA Research Foundation report on July 2020, Modern Vehicle Hazards in Parking Structures and Vehicle Carriers and required in NFPA 88A standard. While the study did not provide some specifics, it did stress that these vehicles are a concern/hazard and additional precautions should be researched and taken.

4. Describe how will the proposal be enforceable?

Since this language is placed within the body of the code, it is fully enforceable and since it is in the FFPC, this will be a uniform statewide topic which is what the preemption to the state wanted.

5. How does the proposal affect Florida's diverse conditions such as climate, construction and population?

The proposed language does not affect the diverse conditions in Florida.

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

Fiscal Impact Statement

Provide the estimated cost of the proposed amendment to the Florida Fire Prevention Code for each of the following questions. Cost data should be accompanied by a list of assumptions and support documentation.

1. Will the proposed amendment have an impact on the local entity relative to the implementation and enforcement of the proposed amendment?

X___ None

_____Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

2. Will the proposed amendment have an impact on the business/property owner relative to the cost of compliance with the proposed amendment?

_____ None

X___Minimal, Provide a brief explanation: There will be an additional cost to building a structure with emergency disconnects.

_____ Other, Provide an explanation for estimate and methodology used:

3. Will the proposed amendment have an impact on small counties or small cities?
(A "small city" is defined by section 120.52, F.S., as any municipality that has an un-incarcerated population of 10,000 or less according to the most recent decennial census. A "small county" is defined by section 120.52, F.S., as any county that has an un-incarcerated population of 75,000 or less according to the most recent decennial census.)

X___ No adverse impact on small cities or small counties

_____ Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

Provide a good faith estimate of the number and types of affected persons/entities:

(1) The number of individuals and entities likely to be required to comply with the rule:

Currently unknown

(2) A general description of the types of individuals likely to be affected by the rule:

Owners and future owners of parking structures or anyone looking to install EVSE systems within a project.

Phase 2

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

PART I

TRANSMIT TO:
Division of State Fire Marshal
Elijah Flowers
200 E. Gaines Street
Tallahassee, FL 32399-0342

Fax: 850/413-3731
E-mail: fire.prevention@myfloridacfo.com

DSFM USE ONLY
Log # P2-06
Date Rec'd 4/9/2025

NOTE: If you need further information on this process, please contact the Fire Prevention Bureau at 850/413-3731.

Please review the evaluation criteria (Part II) and Fiscal Impact Statement before completing this proposal. A separate submittal is required for each proposed amendment.

Type or print legibly in black ink.

Date 4/9/25 Proponent: Tommy Demopoulos Tel. No. 954-600-6150

E-Mail tommy.demopoulos@tamarac.org

Company Tamarac Fire Rescue

Street Address 6000 Hiatus Road

City Tamarac State FL Zip 33321

Organization Represented (if any) Florida Fire Marshals and Inspectors Association (FFMIA)

Local Ordinance No. Jurisdiction Section/Paragraph

NFPA Standard No. and edition year NFPA 101 2024 edition Section/Paragraph 42.8.3.5

Indicate One (Designate by "X" at the end of the line):
1. **X** Revise section to read: X
2. □ Add new section to read:
3. □ Delete section without substitution:
4. □Delete section and substitute the following:

Proposal (underline proposed new wording or strike-through the wording to be deleted):

42.8.3.5 Extinguishing Requirements. ~~(Reserved)~~

42.8.3.5.1 All newly constructed parking structures shall be provided with a Class I standpipe system in accordance with NFPA 14.

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

Statement of Problem and Substantiation for Proposal (Note: State the problem that will be resolved by your recommendation; give the specific reason for your comment including copies of tests, research papers, fire experience, etc. If more that 200 words provide an abstract and describe the source document.) (Must be filled in to be considered):

With new hazards such as electric vehicle supply equipment being installed in open and enclosed parking structures, it is important that proper fire systems exist. This revision will require all parking structures to have a Class I standpipe installed. Studies have proven that copious amounts of water is needed to control and extinguish an electric vehicle that has caught fire. The potential for a rekindle is also far more likely with this type of vehicle. In parking structures with or without a fire sprinkler system, it is essential to life safety and property conservation that first responders are able to get water on a fire as quickly as possible to ensure the fire is kept as small as possible. Since Florida statute 553.895(2) has exceptions to allow a stand-alone parking structure, meeting certain criteria, to omit a fire sprinkler system, these structures are left unprotected and reliant soley on the local first responders having sufficient staffing, hose, training and water supplies. Since these structures also can be constructed without an alarm system, these fires can go unnoticed for a period of time, allowing fire to spread to nearby vehicles and quickly overwhelming the first responders capabilities. NFPA 88A only requires a fire alarm system if structure is enclosed and tied to a mechanical ventilation system. NFPA 88A does require a Class I standpipe only if the structure exceeds heights of 50' or has levels below-grade.

Fires in parking structures can lead to very large economic losses, as evidenced by fires in Liverpool's Echo Arena (United Kingdon 2018) and at Stavanger Airport (Norway 2020). These incidents involved hundreds of automobiles and ultimately resulted in structural collapse of the parking structure and tens of millions of dollars in losses. A large increase in the use of plastic materials has occurred in vehicle construction from the 1970's to 2018 (in western markets). The increased plastic content may lead to faster flame spread within the vehicle, easier ignition and more rapid fire spread to neighboring vehicles.

The US Fire Administration estimates about 650 parking garage fires occur annually in the U.S., causing an estimated $8 million in property damage and 15 injuries annually.

Signature (Required)

4/9/25

Printed Name

Tommy Demopoulos

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

PART II

FLORIDA FIRE PREVENTION CODE	EVALUATION CRITERIA
	LOG NUMBER

The base codes for the Florida Fire Prevention Code shall be **NFPA-1, 2024** and **NFPA-101, 2024**

IMPACT (select one)	STATEWIDE: X	COUNTY:	CITY:

Describe the geographical area of impact:

1. The proposal shall identify the code section or local ordinance to be modified.
2. The proposal (Part I and Part II) along with Financial Impact Statement may be submitted electronically; however, a hard copy is required as follow-up.

Submit this evaluation with each proposed amendment.

1. How does the proposal strengthen the base code to enhance safety in Florida?

The proposal provides additional fire safety systems then what is currently required, which enhances first responders tactics and strategies available to fight a fire within these structures.

2. Is the proposal easy to understand and how does it contribute to a user-friendly code?

We believe the proposal is easy to read and user-friendly

3. Document the proposal's technical merit and how it is supported by a scientific basis?

Studies prove that fire suppression systems are needed within parking structures as identified by the NFPA Research Foundation report on July 2020, Modern Vehicle Hazards in Parking Structures and Vehicle Carriers and required in NFPA 88A standard.

4. Describe how will the proposal be enforceable?

Since this language is placed within the body of the code, it is fully enforceable and since NFPA 1:29.1.1 sends you to NFPA 101 chapter 42, this is enforceable.

5. How does the proposal affect Florida's diverse conditions such as climate, construction and population?

The proposed language does not affect the diverse conditions in Florida.

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

Fiscal Impact Statement

Provide the estimated cost of the proposed amendment to the Florida Fire Prevention Code for each of the following questions. Cost data should be accompanied by a list of assumptions and support documentation.

1. Will the proposed amendment have an impact on the local entity relative to the implementation and enforcement of the proposed amendment?

X___ None

_____Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

2. Will the proposed amendment have an impact on the business/property owner relative to the cost of compliance with the proposed amendment?

_____ None

X___Minimal, Provide a brief explanation: There will be an additional cost to building a structure with a standpipe system when compare to a structure without a standpipe system.

_____ Other, Provide an explanation for estimate and methodology used:

3. Will the proposed amendment have an impact on small counties or small cities?
(A "small city" is defined by section 120.52, F.S., as any municipality that has an un-incarcerated population of 10,000 or less according to the most recent decennial census. A "small county" is defined by section 120.52, F.S., as any county that has an un-incarcerated population of 75,000 or less according to the most recent decennial census.)

X___ No adverse impact on small cities or small counties

_____ Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

Provide a good faith estimate of the number and types of affected persons/entities:

(1) The number of individuals and entities likely to be required to comply with the rule:

Currently unknown

(2) A general description of the types of individuals likely to be affected by the rule:

Developers looking to develop and construct new parking structures.

Phase 2

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

ART I

TRANSMIT TO:
Division of State Fire Marshal
Elijah Flowers
200 E. Gaines Street
Tallahassee, FL 32399-0342

Fax: 850/413-3731
E-mail: fire.prevention@myfloridacfo.com

DSFM USE ONLY
Log # P2-07
Date Rec'd 4/9/2025

NOTE: If you need further information on this process, please contact the Fire Prevention Bureau at 850/413-3731.

Please review the evaluation criteria (Part II) and Fiscal Impact Statement before completing this proposal. A separate submittal is required for each proposed amendment.

Type or print legibly in black ink.

Date 4/9/25 Proponent: Tommy Demopoulos Tel. No. 954-600-6150

E-Mail tommy.demopoulos@tamarac.org

Company Tamarac Fire Rescue

Street Address 6000 Hiatus Road

City Tamarac State FL Zip 33321

Organization Represented (if any) Florida Fire Marshals and Inspectors Association (FFMIA)

Local Ordinance No. Jurisdiction Section/Paragraph

NFPA Standard No. and edition year NFPA 1 2024 edition Section/Paragraph 11.13

Indicate One (Designate by "X" at the end of the line):
1. ☐ Revise section to read:
2. **X** Add new section to read: X
3. ☐Delete section without substitution:
4. ☐Delete section and substitute the following:

Proposal (underline proposed new wording or strike-through the wording to be deleted):

11.13 Electric Vehicle Supply Equipment (EVSE) & Wireless Power Transfer Equipment (WPTE)

11.13.1 General

Electric Vehicle Supply Equipment (EVSE). Equipment for plug-in charging, including the ungrounded, grounded, and equipment grounding conductors, and the electric vehicle connectors, attachment plugs, personnel protection system, and all other fittings, devices, power outlets, or apparatus installed specifically for the purpose of transferring energy between the premises wiring and the electric vehicle. (625) (CMP-12)

Wireless Power Transfer Equipment (WPTE). Installed specifically for the purpose of transferring energy between the premises wiring and the electric vehicle without physical electrical contact. (625) (CMP-12)

11.13.1.1 EVSE & WPTE shall not be installed in any structure not protected throughout by an approved, electrically supervised automatic sprinkler system.

11.13.1.2 Parking spaces designated for EVSE & WPTE shall be a minimum of 17 ft (5181.6 mm) wide.

11.13.1.3 All EVSE & WPTE shall be located on an island to protect against collision damage or shall be protected with pipe bollards or other approved protection.

11.13.2 Electric Vehicle Supply Equipment (EVSE) & Wireless Power Transfer Equipment (WPTE) Installed in Parking Structures

11.13.2.1 EVSE and WPTE shall not be installed within 25 feet (7.62 m) of any required means of egress, within 25 feet (7.62 m) of any vertical structural support member, below-grade or on an entrance or exit ramp.

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

Statement of Problem and Substantiation for Proposal (Note: State the problem that will be resolved by your recommendation; give the specific reason for your comment including copies of tests, research papers, fire experience, etc. If more that 200 words provide an abstract and describe the source document.) (Must be filled in to be considered):

Since the passing of SB 1084 in the 2024 legislative session, this preempts the regulation of electric vehicle charging stations to the state. While the proposed items have been heard during rulemaking workshops with the Florida Department of Agriculture and Consumer Services (FDACS), minimal language related to fire safety has been included. NFPA 70, article 625 has some items related to fire safety and disconnects, there is still much more that needs expanding on to ensure the safety of our first responders and those occupying the buildings with these charging systems installed within. Definitions being proposed are directly from NFPA 70, 2023.

Studies have proven that copious amounts of water is needed to control and extinguish an electric vehicle that has caught fire. The potential for a rekindle is also far more likely with this type of vehicle. In parking structures with or without a fire sprinkler system, it is essential to life safety and property conservation that first responders are able to get water on a fire as quickly as possible to ensure the fire is kept as small as possible. Since Florida statute 553.895(2) has exceptions to allow a stand-alone parking structure, meeting certain criteria, to omit a fire sprinkler system, these structures are left unprotected and reliant soley on the local first responders having sufficient staffing, hose, training and water supplies. Since these structures also can be constructed without an alarm system, these fires can go unnoticed for a period of time, allowing fire to spread to nearby vehicles and quickly overwhelming the first responders capabilities. NFPA 88A only requires a fire alarm system if structure is enclosed and tied to a mechanical ventilation system. NFPA 88A does require a Class I standpipe only if the structure exceeds heights of 50' or has levels below-grade.

Fires in parking structures can lead to very large economic losses, as evidenced by fires in Liverpool's Echo Arena (United Kingdon 2018) and at Stavanger Airport (Norway 2020). These incidents involved hundreds of automobiles and ultimately resulted in structural collapse of the parking structure and tens of millions of dollars in losses. A large increase in the use of plastic materials has occurred in vehicle construction from the 1970's to 2018 (in western markets). The increased plastic content may lead to faster flame spread within the vehicle, easier ignition and more rapid fire spread to neighboring vehicles.

The US Fire Administration estimates about 650 parking garage fires occur annually in the U.S., causing an estimated $8 million in property damage and 15 injuries annually.

To slow the spread of radiant heat to surrounding vehicles, additional buffer areas are being proposed surrounding this equipment. An assessable parking space is 12' with a 5' aisle on one side according to FS 553.5041, persons with disabilities. It is being proposed that a 17' parking space, equivalent to an assessable parking space, is provided in an effort to slow the radiant heat from the vehicle of origin to another if one should catch fire. This will allow for slower fire spread which would let the local fire department arrive, locate the fire, deploy hose and start to apply water to the fire before the fire spread beyond the vehicle of origin.

With people accidentally pressing the gas pedal instead of the brake, collision protection such as pipe bollards or installing equipment on a raised island can help protect the equipment from damages. NFPA 1:42.10.6.1.1.2 has language related to the protection of equipment from collision damage and pipe bollards aircraft fueling. This is not properly addressed in NFPA 70 for this installation.

This proposal restricts EVSE from being installed right next to a means of egress as to not block it if that vehicle catches on fire and requires some distances to in place so that these charging stations are not placed right up against structural members and raises the potential for structural collapse.

Signature (Required)

Tommy Demopoulos
Printed Name

PROPOSAL TO THE 9th EDITION OF FLORIDA FIRE PREVENTION CODE

PART II

FLORIDA FIRE PREVENTION CODE	EVALUATION CRITERIA
	LOG NUMBER

The base codes for the Florida Fire Prevention Code shall be **NFPA-1, 2024** and **NFPA-101, 2024**

IMPACT (select one)	STATEWIDE: X	COUNTY:	CITY:

Describe the geographical area of impact:

1. The proposal shall identify the code section or local ordinance to be modified.
2. The proposal (Part I and Part II) along with Financial Impact Statement may be submitted electronically; however, a hard copy is required as follow-up.

Submit this evaluation with each proposed amendment.

1. How does the proposal strengthen the base code to enhance safety in Florida?

The proposal provides additional fire safety then what is currently required in national base codes, which enhances first responders tactics and strategies available to fight a fire within these structures. This enhances safety to Florida's first responders and provides uniform codes and enforcement since regulations related to these systems are preempted to the state.

2. Is the proposal easy to understand and how does it contribute to a user-friendly code?

We believe the proposal is easy to read and user-friendly

3. Document the proposal's technical merit and how it is supported by a scientific basis?

Studies prove that fire suppression systems are needed within parking structures as identified by the NFPA Research Foundation report on July 2020, Modern Vehicle Hazards in Parking Structures and Vehicle Carriers and required in NFPA 88A standard. While the study did not provide some specifics, it did stress that these vehicles are a concern/hazard and additional precautions should be researched and taken.

4. Describe how will the proposal be enforceable?

Since this language is placed within the body of the code, it is fully enforceable and since it is in the FFPC, this will be a uniform statewide topic which is what the preemption to the state wanted.

5. How does the proposal affect Florida's diverse conditions such as climate, construction and population?

The proposed language does not affect the diverse conditions in Florida.

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Fiscal Impact Statement

Provide the estimated cost of the proposed amendment to the Florida Fire Prevention Code for each of the following questions. Cost data should be accompanied by a list of assumptions and support documentation.

1. Will the proposed amendment have an impact on the local entity relative to the implementation and enforcement of the proposed amendment?

X None

_____Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

2. Will the proposed amendment have an impact on the business/property owner relative to the cost of compliance with the proposed amendment?

_____ None

X Minimal, Provide a brief explanation: There will be an additional cost to building a structure with EVSE and WPTE and potentially a loss of parking spots within a parking structure since the spaces with EVSE will be wider to slow the spread of fire.

_____ Other, Provide an explanation for estimate and methodology used:

3. Will the proposed amendment have an impact on small counties or small cities?
(A "small city" is defined by section 120.52, F.S., as any municipality that has an un-incarcerated population of 10,000 or less according to the most recent decennial census. A "small county" is defined by section 120.52, F.S., as any county that has an un-incarcerated population of 75,000 or less according to the most recent decennial census.)

X No adverse impact on small cities or small counties

_____ Minimal, Provide a brief explanation:

_____ Other, Provide an explanation for estimate and methodology used:

Provide a good faith estimate of the number and types of affected persons/entities:

(1) The number of individuals and entities likely to be required to comply with the rule:

Currently unknown

(2) A general description of the types of individuals likely to be affected by the rule:

Owners and future owners of parking structures or anyone looking to install EVSE systems within a project.