



Florida Division of State Fire Marshal

The Florida Fire Marshals and Inspectors Association,
"Organization" (§633.026)

Informal Interpretation

Date: 9/28/21

Edition of the NFPA Document: 2018 (Florida Fire Prevention Code, Seventh Edition)
Chapter and Paragraph of the NFPA Document: NFPA 1 18.2.3.2.1.1

Explain how the Petitioner's substantial interests are being affected by the question below:

We have designed a community of several one- and two-family built-to-rent (BTR) cottage units on a single lot, in compliance with the separation distances of the Residential building code. Some of these buildings do not have a door within 50' of the fire lane, but all exterior walls of all buildings are within 150' of the fire lane. The LFO interprets that domestic sprinkler (13D) are required in these buildings per the code section cited above (FFPC NFPA 1 18.2.3.2.1.1). However, the State of Florida appears to have potentially removed all requirements for fire sprinklers in any- one- or two-family dwelling. Reference Florida State Statute Title XXXVII Chapter 633 Section 208 item 9 and 10: (9) Before imposing a fire sprinkler requirement on any-one- or two-family dwelling, a local government must provide the owner of any- one- or two-family dwelling a letter documenting specific infrastructure or other tax or fee allowances and waivers that are listed in but not limited to those described in subsection (8) for the dwelling. The documentation must show that the cost savings reasonably approximate the cost of the purchase and installation of a fire protection system. (10) Notwithstanding subsection (8), a property owner may not be required to install fire sprinklers in any residential property based upon the use of such property as a rental property or any change in or reclassification of the property's primary use to a rental property. The LFO has not followed items 9 or 10, which creates additional costs to the project.

The section (NFPA 1 18.2.3.2.1.1) should be struck, or at best clarified to only apply to R-3 buildings in the Florida Building Code – Building and not any buildings in the Florida Building Code – Residential, as it appears to potentially conflict with state law.

Enter the Petitioner's question concerning an interpretation of the FFPC:

Are domestic sprinklers required in residential buildings with entrances more than 50' from the fire lane?

Boards Answer: Yes

If the designer chooses to use the trade-up option in NFPA 1/FFPC that allows entrances to be greater than 50' from the fire apparatus access road, then fire sprinklers must be provided to utilize that trade-up option. The designer does not have to provide fire sprinklers by designing the development

Rulings herein expressed are not the formal position of the Florida State Fire Marshal's Office

Florida Fire Marshals and Inspectors Association | P. O. Box 325 Hobe Sound, FL 33475 | Tel 772-349-1507 | Fax 772-546-6675

Website: www.FFMIA.org | Email: info@ffmia.org | http://www.myfloridacfo.com/sfm/bfpr/bfpr_index.htm



Florida Division of State Fire Marshal

The Florida Fire Marshals and Inspectors Association,
"Organization" (§633.026)

to provide doors within 50' from the front of the fire apparatus access road. The designer could choose to comply with the base code without the trade-up option.

The provisions of 633.208(8) and (9) only relate to local amendments to the FFPC. Those statutory provisions, read in context and to original statutory intent, do not apply to the core provisions of the FFPC or the trade-up allowances in the FFPC. Even if the petitioner's argument that 633.208(8) and (9) was intended to invalidate the sprinkler trade-up options in the FFPC for one-and two-family dwellings was assumed to be valid, then the result would be to invalidate the entire trade-up option and default the requirement to 50' with no option for an added distance allowance. It would not delete the sprinkler trade-up but keep the 150' allowance.

It is important to note that the access provisions of the FFPC only apply to one exterior door, not all "entrances."

Note: The position stated in this informal interpretation represents the position of a majority of the members of this committee.

Region 1 - Delegate: Vacant
Alternate: Vacant

Region 2 - Delegate: Vacant
Alternate: Vacant

Region 3 - Delegate: **James Groff** Jacksonville Fire Rescue * Committee Chair
Alternate: **Robert Growick** Division Chief /Fire Marshall City of St. Augustine

Region 4 - Delegate: **Cheryl Edwards** Lakeland Fire Rescue
Alternate: **Scott Finley** Auburndale Fire Department

Region 5 - Delegate: **Anthony Apfelbeck** Altamonte Springs Building and Fire Safety Department
Alternate: Vacant

Region 6 - Delegate: **Robert Salvaggio** Cape Corral Fire Rescue
Alternate: **Janet Washburn**, Bonita Springs Fire Control and Rescue District

Rulings herein expressed are not the formal position of the Florida State Fire Marshal's Office

Florida Fire Marshals and Inspectors Association | P. O. Box 325 Hobe Sound, FL 33475 | Tel 772-349-1507 | Fax 772-546-6675

Website: www.FFMIA.org | Email: info@ffmia.org | http://www.myfloridacfo.com/sfm/bfpr/bfpr_index.htm



Florida Division of State Fire Marshal

The Florida Fire Marshals and Inspectors Association,
"Organization" (§633.026)

Region 7 - Delegate: **Matthew E. Welhaf** Boca Raton Fire Rescue Services Department
Alternate: **Sean Brown** Broward Sheriff Fire Rescue & Emergency Services Department

Committee Region Map



Rulings herein expressed are not the formal position of the Florida State Fire Marshal's Office

Florida Fire Marshals and Inspectors Association | P. O. Box 325 Hobe Sound, FL 33475 | Tel 772-349-1507 | Fax 772-546-6675

Website: www.FFMIA.org | Email: info@ffmia.org | http://www.myfloridacfo.com/sfm/bfpr/bfpr_index.htm