



February 12, 2026

Gulliver Prep

6575 SW 88 Street

Pinecrest, Florida 33156

Project Name: Gulliver Prep Modular Classrooms

Project Location: 6575 SW 88 Street; Pinecrest, Florida 33156

Project Description: Code Interpretation (FFPC Section 14.3.5.2)

Existing Building, LLC (EB) has been retained by Gulliver Prep to review the prescriptive fire sprinkler requirements for the Gulliver Prep Modular Classrooms project. The project consists of ten separate modular buildings with a total area of roughly 8,000 square feet. Each modular building will be roughly 800 square feet in area and is intended to serve as a single classroom.

In accordance with Florida Fire Prevention Code (FFPC) Section 14.3.5.2, the extinguishment requirements of FFPC Section 14.3.5.1 may be exempt under certain conditions. The intent of this deliverable is to summarize the applicable code requirements and evaluate compliance with the stated exceptions.

It is the professional opinion of EB that this Code Interpretation provides a strategy that satisfies the applicable requirements for the Florida Fire Prevention Code.

Sincerely,

Existing Building, LLC

2448 Sunset Vista Drive

Spring Hill, FL 34607

1. Building Description

Gulliver Prep is an existing educational campus serving students in Grade 12 and below, located in Pinecrest, Florida. The campus spans approximately 40 acres and includes various academic and athletic facilities; however, the scope of this assessment is limited solely to the ten modular classrooms being installed on the property. The modular classrooms will be provided with new fire alarm devices, and a schematic of the ten modular buildings is shown in Figure 1.

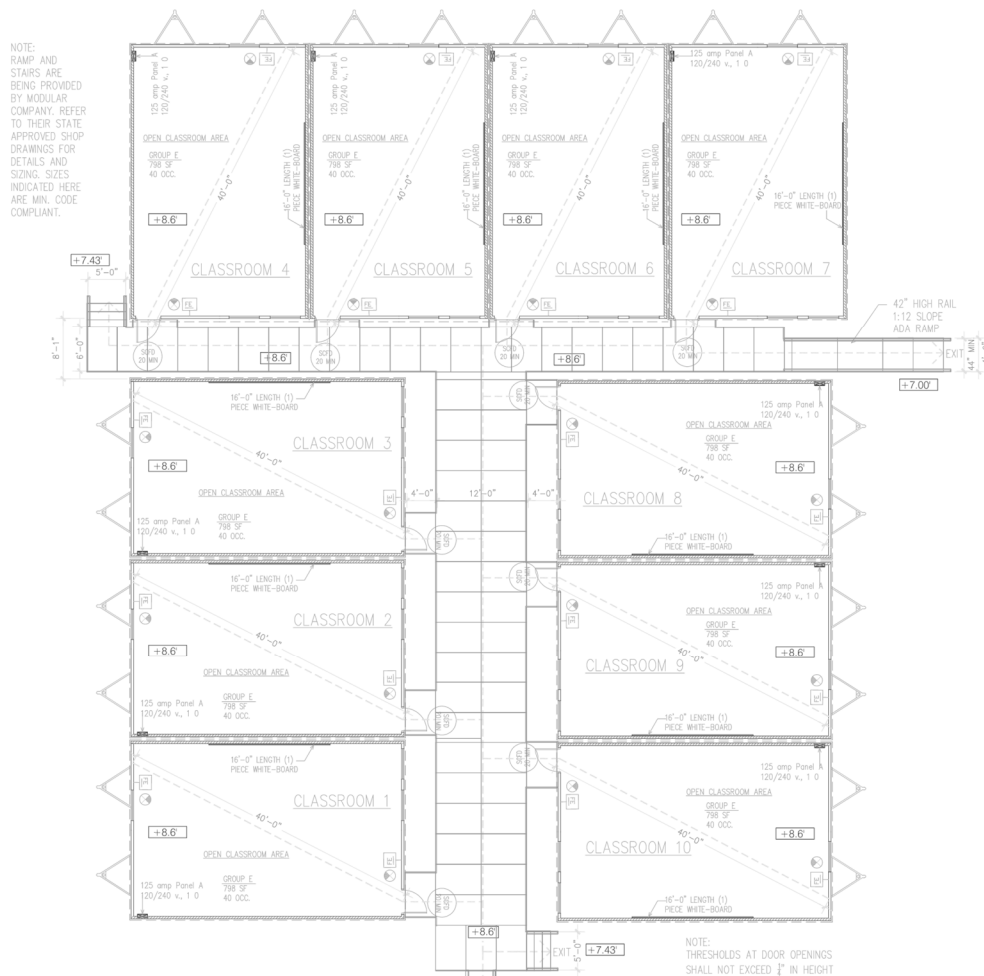


Figure 1: Gulliver Prep Modular Classroom

Based on the proposed use of the modular classrooms, the classrooms meet the classification for permanent buildings in accordance with the FFPC. Accordingly, EB respectfully requests that the buildings be classified as “non-relocatable” under FFPC Section 14.3.5.2.

2. Code Requirements

The FFPC generally categorizes buildings as either “permanent structures” or “temporary structures.” The definitions for each classification are provided below:

3.3.284.9 Permanent Structure.

A building or structure that is intended to remain in place for a period of more than 180 days in any consecutive 12-month period. (SAF-FUN)

3.3.284.10 Temporary Structure.

A building or structure not meeting the definition of *permanent structure*. (See also [3.3.284.9](#), *Permanent Structure*.) (SAF-FUN)

Figure 2: FFPC Section 3.3.284

Based on the intended use of the Gulliver Prep modular buildings, the structures meet the definition of a permanent, Educational occupancy. However, the classifications outlined in Chapter 14 of the FFPC do not directly align with these definitions.

FFPC Section 14.3.5 further states that new educational occupancies are required to be protected throughout by an automatic fire sprinkler system, unless otherwise permitted by FFPC Section 14.3.5.2, as shown below:

14.3.5.2

The requirement of [14.3.5.1](#) shall not apply to any of the following:

- (1) Non-relocatable buildings having an area not exceeding 1000 ft² (93 m²)
- (2) Non-relocatable buildings containing a single classroom
- (3) The requirement of [14.3.5.1](#) shall not apply to relocatable buildings not exceeding 12,000 ft² (1120 m²) or complying with the allowed square footage and construction type requirements as indicated by the Florida Building Code, whichever is more stringent. Refer to the Florida Building Code, Types of Construction and the State Requirements for Educational Facilities.

Figure 3: FFPC Section 14.3.5.2

Each modular classroom is approximately 800 square feet and is intended to function solely as an individual classroom, satisfying the criteria of both FFPC Section 14.3.5.2(1) and FFPC Section 14.3.5.2(2). In addition, the combined area of the eight modular classrooms is approximately 8,000 square feet, which may independently qualify for the exception outlined in FFPC Section 14.3.5.2(3) applicable to relocatable buildings.

It is also important to note that the base edition of NFPA 101 includes additional building separation requirements for relocatable structures under NFPA 101 Section 14.3.5.2. However, this language has been amended out of the FFPC. Given this Florida-specific amendment relates to relocatable buildings, and considering that the proposed buildings more closely resemble non-relocatable structures, it is the professional opinion of EB that this unamended NFPA 101 requirement does not apply to the proposed project.

3. Code Interpretation

It is the understanding of EB that each modular classroom will remain in place for approximately two years, which exceeds the duration associated with a temporary structure under FFPC Section 3.3.284. Additionally, each unit will be provided with an interlocking deck system intended to support long-term use. This deck system will be fully permitted and would be inconsistent with the factory-built school buildings described in Florida Statute 553.415. Although the modular classrooms and deck systems could theoretically be disassembled, it is the professional opinion of EB that the overall condition more closely aligns with the intent of a non-relocatable building outlined by FFPC Section 14.3.5.2.

It is important to note that automatic fire sprinkler protection is not required in non-relocatable buildings that either (1) have an area not exceeding 1,000 square feet or (2) contain a single classroom. Each modular classroom will be approximately 800 square feet in area and will contain a single classroom, thereby independently meeting both of these exceptions. Additionally, it should be considered that each classroom is provided with an exterior door discharging directly to the outside without requiring travel through a shared corridor. Building separation distances will be further evaluated in accordance with the Florida Building Code.

Based on these factors, EB respectfully requests that each modular classroom be classified as a non-relocatable building meeting the fire sprinkler exceptions provided in FFPC Sections 14.3.5.2(1) and 14.3.5.2(2). It is the professional opinion of EB that this Code Interpretation provides a strategy that satisfies the applicable requirements for the Florida Fire Prevention Code.

Sincerely,

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