

Statewide Fire Prevention Code (SFPC) Sub Workgroup Meeting Summary

February 16th, 2022 9:00 a.m. – 12:15 p.m.

Virtual Meeting: <https://vadhcd.adobeconnect.com/va2021cdc/>

ATTENDEES:

VA Department of Housing and Community Development (DHCD) Staff:

Florin Moldovan: Code and Regulation Specialist, SBCO

Jeff Brown: State Building Codes Director, State Building Codes Office

Richard Potts: Code Development and Technical Support Administrator, SBCO

Paul Messplay: Code and Regulation Specialist, SBCO

Sub Workgroup Members:

Andrew Milliken: VFSB Chairman of Fire Codes and Standards Committee

Dustin Wakefield: Virginia Department of General Services, Division of Engineering and Buildings

Jimmy Moss: Virginia Building and Code Officials Association

Lou Wolf: American Institute of Architects, Virginia Chapter

Matthew Lannon: Virginia Restaurant, Lodging & Travel Association

Other Interested Parties:

Nolie Diakoulas

Russell Furr

Alan Larsen

Ron Clements

Timothy Loscomb

Gerry Maiatico

Sub Workgroup Members Not in Attendance:

Mike O'Connor: Virginia Petrol and Convenience Marketers Association

Steve Shapiro: Apartment and Office Building Association

Joshua Davis: State Fire Marshal's Office

Linda Hale: Virginia Fire Prevention Association

Jodi Roth: Virginia Retail Federation

AGENDA AND DISCUSSION ITEMS:

Welcome and Introductions

Florin Moldovan: Called the meeting to order at 9:00 am and began introductions of DHCD staff and members of the sub workgroup.

Discussion

Florin: Provided the SFPC sub workgroup members with an overview of Virginia's code development process and the 2021 SFPC base document with a power point presentation.

Proposals

FP901.4.8-21

Florin: Opened the floor to the proponent, Andrew Milliken, to provide an overview of this proposal and its intent.

Andrew: This proposal is a reference to a common violation and there is not a provision in the SFPC to cite for a violation. The intent of this proposal is to ensure that we have a direct pointer to maintaining construction features that allow the fire protection features to operate as intended when they were installed.

Dustin Wakefield: The first thing that jumps out is the word "Maintenance." Asks if Andrew has considered any overlap with the Maintenance Code. Looking at the specifics of the statement, "Where required by the installation standard," asks if this is where walls, ceilings, and tiles are required, or where maintenance of such items are required? It is unclear what the proposals is saying. Suggests possible room for re-wording to clarify what this proposal is saying.

Andrew: The SFPC is a maintenance and operations code, so there is a lot of maintenance language. The intent of this proposal is to make sure that it is required by the installation standard to provide those features – walls, ceiling, etc. Andrew states that he is open to any clarifying language.

Dustin: It would be helpful to clarify something along the lines of, "Where maintenance of specific elements, such as walls, ceilings, tiles, etc., is required by the standard..." Something definitively to state what is required and what is being maintained.

Andrew: The installation standard is not a maintenance standard, so this is just saying that when the installation requires those features, those features need to be maintained. We want to make sure the SFPC is maintaining the features as they are installed.

Dustin: "Where components such as walls, ceiling tiles, etc. are required by the installation standard, such features shall be maintained in accordance with the applicable building code."

Andrew: No objection there.

Jimmy Moss: The proposed change would make this fall along with what has been done throughout the Maintenance Code. Then the language would be consistent with all the previous language.

Florin: Asks for Andrew to coordinate with DHCD staff, Dustin, and Jimmy to correlate the language.

Jeff: Points out that we are pretty close to everyone being in agreement. This proposal will be on the March workgroup agenda for discussion, so there is time to work out this language. There could be a friendly floor amendment made at that general workgroup meeting.

FP901.6.3.2-21

Andrew: This section is intended for all fire protection systems that have annual inspections to provide either a tag or a sticker indicating the completion of the inspection and is intended to help make sure we have that information readily available to the property owner and authority having jurisdiction for these systems. This proposal language is taken from a number of other states that have similar requirements in the code.

Dustin: Asks about the referenced standards that govern these fire protection systems and whether there is any conflict between the language in the proposal and the requirements in the referenced standards.

Andrew: Great question. There are a number of different referenced standards that provide guidelines for tags and stickers, such as NFPA 25 for sprinklers and water-based fire protection systems. In the fire alarm world this is less prevalent, which is one of the areas where this could make sure we are uniform across the board. Andrew does not know of any referenced standard where this would create conflict since the proposal is based around the NFPA 25 guidelines.

Dustin: Asks if it would make any sense to preface this proposal with, “unless specifically addressed otherwise in a referenced standard,” or, “unless not otherwise noted in governing standards for fire protection systems”?

Andrew: That is something we can look at. The goal here is to have more of an umbrella approach. We can provide more language if we need to, but sometimes that is not well embraced by code writing. Unless we know of a specific conflict that exists. Is open to a prefacing statement if it helps reach consensus.

Florin: Perhaps the two of you can collaborate on this proposal afterward.

Andrew: Asks Dustin to email him some proposed language or suggestions that we could get incorporated.

FP1201.3-21

Andrew: This proposal deals with Electrical Storage Systems (ESS). This was an item deleted in the 2018 edition. This is not related to those significant changes in the base document. This was a statement that was deleted that speaks to the mixing of ESS and making sure that we handle these in the same way that we handle hazardous materials. The code identifies quantity limits within Ch. 12, which have been deleted since they are construction, but this seeks to reinstate the hazardous material quantity limits by speaking to the quantities allowed in the applicable building code. Not setting a threshold or an amount, but referencing back to the thresholds in the applicable building code. The last statement speaks to the fire official having a hazard mitigation plan for quantities in excess of those thresholds.

Florin: Is there anyone not in agreement with this proposal or whom opposes this proposal?

Florin: Since there is no opposition, it seems we could add the SFPC sub workgroup as a co-proponent on this proposal unless anyone has any opposition to that.

Alan Larsen: I don't oppose it, so much as I don't understand it.

Florin: Thank you for your feedback, Alan, and perhaps Andrew can answer your questions. If no one in the sub workgroup is opposed to it, then we will move it forward as consensus. If it comes down to a vote, it will be a vote among those in the official SFPC sub workgroup. No one from the SFPC sub workgroup is speaking against it or providing any negative comments, so, with that said, if no one in the sub workgroup members list opposes the proposal, we will move it forward as consensus and we will add the group to the list of co-proponents.

Jimmy: This is a good proposal. Jimmy has been in agreement with it from the first time he heard it in the fire services work group. He does not see how there is any conflict in any way. States that this is a very good proposal.

Florin: We will add the SFPC sub workgroup as a co-proponent in cdp VA.

2021 SFPC Base Document – Proposed Changes by the Virginia Fire Services Board

Florin: Provides brief overview of the structure of the spreadsheet being shared and how these decisions will be submitted in cdp VA. It will be up to Andrew as to how he wishes to handle the non-consensus items. The purpose here is to try and gain consensus on whichever items we can today to make it easier for the proponents' sake. DHCD will assist with compiling everything in the proposal much like we have done in the past with the SFPC edits. Thanks Andrew and VFSB for going through these items. It is a very time-consuming process but very much worth it in the end.

** A copy of the spreadsheet cataloging these proposed changes is attached to this summary for reference. **

Proposed Changes Approved as Written Without Discussion

The following proposed changes received Consensus for Approval and contained no discussion.

Table 405.3	603.1 General	Section 806
1001.1 General	1207.1.2.1 Communication utilities	1207.1.2 Permits
107.2 Permits required	1207.2.1 Commissioning	1207.1.4.3 Additional protection measures
1207.1.6 Fire remediation	1207.3.6 Repairs or alterations	1207.2.1.2 Commissioning report
1207.2.2 Operations and maintenance	1207.4.2 Working clearances	1207.4 Signage
1207.4.1 Electrical disconnects	1207.4.6 Combustible storage	1207.4.3 Fire-resistance-rated separations
1207.4.5 Vehicle impact protection	1207.4.9 Security installations	1207.4.7 Toxic and highly toxic gasses
1207.4.8 Signage	1207.10.3 Permits	1207.4.10 Occupied work centers
1207.10 Mobile ESS equipment and operations	2203.1 Critical Depth Layer	1207.10.4 Documents
1207.10.4.1 Deployment Documents	2203.4.6 Smoking prohibited	2203.3.3 Cleanouts
2203.4.1 Classified electrical	2203.5 Housekeeping	2203.4.7 Spark-producing devices

2203.4.9.4 Inspection and preventative maintenance	3107.13.2 Location of Containers	2203.7 Emergency response plan
2205.1.1.1 Dust hazard analysis	5704.2.13.1.1 Temporarily out of service	3904.2.1 Listings
3904.2.2 Approvals	610.1 Installation	5704.2.13.1.2 Out of service for 90 days
107.2 Industrial additive manufacturing operational permit	4003.1 Spill control	808.5 Play structures
901.4 Maintenance and alterations	4004.3 Basement storage	4003.2 Ventilation
4003.4 Lightning	1207.1 General	4005.1 Automatic sprinklers
603.1.1 Equipment and wiring	1029 Assembly	1207.1.5 Large-scale fire test

Proposed Changes Approved as Written with Discussion

The following proposed changes received Consensus for Approval as written and contained discussion.

806.1.4 Fire-retardant treatment for naturally cut trees

Andrew: This section is currently deleted in the base document. This is in italics because the intent is to go back to the model codes. In this particular situation this references the fire retardant treatment on trees. We feel it is important to have that reference maintained.

Florin: Asks for any comments from the group. Hearing no comments, Florin moves this forward as consensus for approval.

Andrew: Is not sure how this should be documented. The intent is to just delete the charging statement to bring in the model languages.

Florin: In the regulations we would just strike off that charging statement. Jeff is documenting on the screen what we will include in this proposal: "Delete state amendment and incorporate the 2021 IFC section 806.1.4."

908.3 Fire alarm system interface

Andrew: This is something that is similar to some of our duct detection concerns and issues. We would want to include the supervisory signal as an option for buildings with these systems.

Ron Clements: Supports this change and thinks there should probably be a companion to this for the building code.

Andrew: Believes that this will already be in the 2021 building code.

Florin: Any other comments? Seeing none, we can mark this as consensus for approval.

Florin: Asks Ron if he is willing to take a look at this and make sure it's addressed in the I-codes and if it's not, to make the appropriate companion proposal. Ron agrees to take this on.

1201.2 Electrical wiring and equipment

Andrew: This proposal makes sure we encompass all of the references like the model code does.

Florin: Just a point of clarification on this one, DHCD Staff did not make any changes to the base document, we just maintained what was already in the 2018 SFPC.

Andrew: Yes, this was just something that was missed in the last cycle.

Florin: Any concerns with 1201.2? Hearing no concerns, we will mark this down as consensus for approval.

1207.2.3 Decommissioning

Andrew: Just as commissioning is important on these systems, so is decommissioning. This is scoped for decommissioning of mobile ESS.

Florin: Any comments? Seeing none, we will mark this down as consensus for approval.

Florin: Asks if Andrew is okay with Staff correcting the grammatical issue of “ESS Systems” being redundant.

Andrew: Yes.

1207.10 Table

Andrew: This proposes to change the reference to simply reference the IFC section for this table. We feel that the column that says “Section” and gives a number, needs to be an IFC section as opposed to just “Section.”

Florin: Asks Andrew to clarify if the intent is just to add the word “IFC” to ensure the section we reference is actually the IFC section and not an SFPC section, correct?

Andrew: Correct

Florin: Any concerns? Hearing none, we will mark this as consensus for approval.

1207.10.6 Charging and storage

Andrew: This just indicates the IFC for these compliance items.

Florin: This is similar to the previous one where we deleted some sections so that we can reference the IFC, correct?

Andrew: Correct.

Florin: Any concerns? Seeing none, we will mark this down as consensus for approval.

2203.1 Table

Andrew: Since we are keeping the critical depth layer from the previous section, it's important to keep this table.

Florin: So, the idea is we want to maintain Table 2203.1 from the IFC, correct?

Andrew: Yes

Florin: Any questions? Seeing none, we will mark this down as consensus for approval

2203.4.5 Powered industrial trucks

Andrew: The base document says any powered equipment needs to maintain its listing, but it's not just that it needs to maintain the listing. The idea is that where those vehicles are used, they should be listed.

Florin: Any questions?

Florin: Is there a possibility that the codes in the past did not require these to be listed? Do you know of any of these requirements from several cycles ago?

Andrew: When we are talking about powered equipment that is portable and mobile, it is not necessarily under the purview of the building code.

Florin: Any other questions? Seeing none, we will mark this down as consensus for approval.

2203.4.9.2 Space heaters

Andrew: We feel the use and operation of a portable space heater is something that should be regulated by the SFPC. The modified language here identifies that we are talking about portable space heaters, not stationary devices.

Florin: Any questions?

Florin: Could the second sentence incorporate all appliances, even those that are stationary? Or is it implied in the first sentence that the second sentence only covers portable?

Andrew: You could put "portable" in front of the title, but we felt the model code language captures the intent.

Florin: It sounds like there are no other comments from the group so we will mark this as approved.

3303.5 Fire safety requirements of Types IV-A, IV-B and IV-C buildings

Andrew: Item #3 refers to construction features that are required by the building official in accordance with the applicable building code. Item #1 correlates the language by pointing to the appropriate standpipes section.

Florin: Any questions?

Florin: One quick question, is Item #3 the same as Item #3 in the 2018? That item was deemed unenforceable by the attorney general.

Andrew: It is not the same Item #3.

This proposal was moved forward as Consensus for Approval

Proposed Changes Approved as Modified by the Sub Workgroup

603.2.1 Modified or damaged

Andrew: This change is with regard to the reference to the term “This code and NFPA 70”. The model code talks about making sure equipment and devices are not modified or damaged to constitute a fire hazard in accordance with this code or NFPA 70.

Florin: Have we considered adding “The applicable” in front of NFPA 70?

Andrew: We would not have any opposition to that.

Ron: Should this reference the existing building code?

Andrew: Asks if Ron is suggesting “Applicable building code, instead of ‘this code’”?

Ron: Yes, that probably does it.

Andrew: We would not have any issue with that.

Dustin: This is just another wording nuance, but where it says “The applicable NFPA 70 standard” are we saying the enforced edition of or the applicable portion of?

Florin: What we have done in the previous SFPC edits is used “The applicable” in front of the standards, which would be applicable at the time of construction. If it just read “in accordance with NFPA 70”, it would cause enforcement issues with those who think it references the current edition. Does that answer your question?

Dustin: It does if it is clear that it is applicable at the time of construction.

Florin: There is a definition of applicable building code in Ch. 2.

Ron: Not that it is a deal breaker, but if you get “applicable building code” you get to that NFPA standard at the time.

Florin: Any comments regarding that?

Andrew: We are in the realm of trying to obtain consensus, so if that gets us to consensus, we can do that. The idea was that these references to NFPA 70 come from the model code, so we are trying to stay consistent with that. But we would not be opposed if that is the pleasure of the group.

Florin: Do I hear from the group that it should read, “...in accordance with the applicable building code.” And delete the reference to NFPA 70?

603.2.1 Modified or damaged. Electrical wiring, devices, equipment and appliances that are modified or damaged, and constitute an electrical shock or fire hazard, shall not be used until repaired or replaced in accordance with the applicable building code.

Andrew: Yes, that gets us consensus.

603.5 Relocatable power taps and current taps

Andrew: This is very similar to the others and, as Ron has pointed out, we can do what we have done before with the language. Taps and relocatable taps are defined terms so we want to incorporate language that references this code and the applicable building code.

Florin: Any comments? Hearing none, we can do what we have done with the other ones to read "in accordance with the applicable building code."

Andrew: We want to leave "In accordance with this code and the applicable building code."

603.5 Relocatable power taps and current taps. The construction and use of current taps and relocatable taps shall be in accordance with this code and the applicable building code.

Ron: If we just left it as "applicable building code" we would be leaving out the maintenance enforcement from this code.

1004.7 Outdoor areas

Andrew: This basically specifies what these outdoor areas are, which mirrors model code language.

Dustin: Just to make sure we account for anyone that could be using these outdoor areas in 1004.7. Maybe instead of saying, "useable by the building occupants," we say "useable outdoor areas," so this would take some of the guess work out for those using it.

Andrew: This was just using model code language but I would be fine with that change.

Florin: So, we're just deleting "and useable by the building occupants."

Andrew: That's what Dustin was getting at.

Dustin: I was getting at "similar accessible and useable outdoor areas."

Florin: Does that look good (referencing the language typed on the screen)?

1004.7 Outdoor areas. The means of egress for yards, patios, occupied roofs, courts and similar accessible and usable outdoor areas shall be maintained in accordance with the applicable building code.

Dustin and Andrew: Agree it looks good.

Florin: We will mark this down as consensus as amended.

1203.2.5 Exhaust ventilation

Andrew: This is similar to other language we have provided with regard to exhaust ventilation. This removes the construction concept and includes the maintenance concept.

Florin: Any questions?

Dustin: Is this a case where we would want to preface this with, "When required," because this statement makes the assumption that this is required in every case.

Andrew: The closest language we have gotten to is, "Where required or provided," so if we wanted to provide that language that would be fine.

Florin: Does the amended text on the screen meet what you're trying to accomplish?

Dustin: Yes, the clarification there helps.

Florin: It sounds like the modified version is something that everyone agrees with.

Jeff: In reading this again, it is reading a little funny, "Where provided or required..." Suggests reversing the order to read: "Where standby power for mechanical exhaust ventilation systems is provided or required by the applicable building code, it shall be maintained."

Dustin: You may want to add, "standby power shall be maintained accordingly."

Jeff: Makes the edit on the spreadsheet and asks if that works:

1203.2.5 Exhaust ventilation. Where standby power for mechanical exhaust ventilation systems is provided or required by the applicable building code, the standby power shall be maintained.

Dustin: That looks good.

1207.1.1 Scope and Table 1207.1.1

Andrew: This proposal is to revert back to the model codes and not have a state amendment. This section is a scoping section, it is not a construction or maintenance requirement. This is identifying what types of ESS are within the scope of this particular section. This may have been overlooked and seen as a construction table and we feel it is appropriate to have the scope for this section and what it applies to.

Florin: Could there be existing facilities that are in compliance with the applicable building code but not necessarily the 2021 IFC. Are we creating a situation here where when the 2021 goes into effect, there could be a chance that existing buildings are in non-compliance with the SFPC?

Andrew: No, this is a scoping section. This says that any smaller devices that do not meet the threshold values do not have maintenance requirements. This would not affect construction or put anything in non-compliance.

Florin: Any other questions?

Jeff: If we continue going through 1207 using maintenance language, the scoping language will not be a problem. There are places in 1207 addressing mobile ESS, which might have some construction requirements, and we may have to revisit this to see if we need to tweak it a little bit. Believes we are fine now, but wants the group to keep this in mind as we move forward.

Andrew: As we go down through this, when we get to mobile ESS, that is a separate section and there are construction requirements, but it is outside of 1207.1

Jeff: Believes that scoping is referring to all of 1207. Reiterates that we are okay, but if we get into construction provisions, we can talk about it and maybe revisit.

Jeff: During the discussion of 1207.1.5, suggests going back to the scoping language in 1207.1 and 1207.1.1 and adding language stating, "Mobile ESS shall comply with this section." We should maybe make it clear for mobile ESS which are not regulated by the USBC.

Andrew: Would that be something to put in 1207.10, at the beginning of the mobile section? Or should we put it in the scope?

Jeff: Unsure. We could discuss that.

Jimmy: Believes adding it to the scoping section would be best so you will know right from the beginning where this applies. This would make it easier going forward in the changes so you won't have to make sure that all of your language is specific to one or the other.

Florin: Any thoughts regarding that?

Andrew: Agrees with Jimmy. We can certainly come up with language in the scoping section to make it clear.

Florin: Sees a conflict between 1207.1 and 1207.1.1. 1207.1 requires compliance with the applicable building code and 1207.1.1 requires compliance with this section. Is this section imposing anything beyond what the applicable building code would have required?

Andrew: The intent of the scoping section is to make sure we are not regulating very small ESS equipment. It is important to not have maintenance requirements for small, handheld mobile phone chargers, for example. Does not believe that there is a requirement that is conflicting, but it may be something we want to review.

Jeff: Provides updated language on the spreadsheet to 1207.1.1:

"1207.1.1 Scope. Mobile ESS having capacities exceeding the values shown in Table 1207.1.1 shall comply with this section. Other ESS having capacities exceeding the minimum ESS threshold quantities of the applicable building code shall be operated and maintained in accordance with this section and the applicable building code."

Andrew: That should do it.

Florin: Any comments or concerns with this language? Hearing none, we will move this as consensus as modified.

1207.1.4 Hazard mitigation analysis

Andrew: This was modified to not necessarily require a hazard mitigation analysis be provided, but to ensure that a copy of that a failure modes and effect analysis (FMEA) be provided to the Fire Official.

Jimmy: As it reads, that approved document has to be provided.

Andrew: Sure. We can add “when an FMEA is required by the applicable building code, a copy shall be provided.” We were just trying to match the model code language as much as possible.

Dustin: Just noticing that it says “Fire Official”. Don’t we typically refer to the “Fire Code Official.”

Jeff: We might actually address that in definitions or Ch. 1.

Ron: Posts in the chat that fire official and fire code official mean the same thing.

Language approved as modified:

1207.1.4 Hazard mitigation analysis. Where a failure modes and effects analysis (FMEA) or other approved hazard mitigation analysis is required by the applicable building code, a copy shall be provided to the Fire Official under any of the following conditions:

- 1. Where ESS technologies not specifically identified in Table 1207.1.1 are provided.*
- 2. More than one ESS technology is provided in a room or enclosed area where there is a potential for adverse interaction between technologies.*
- 3. Where allowed as a basis for increasing maximum allowable quantities.*

Proposed Changes Withdrawn

1201.3 Mixed Systems

Proposed Changes Receiving Non-Consensus

901.4.3 Alterations in buildings and structures

Andrew: This is a newer section for the model code, which we have modified a bit to remove the construction provisions to state that fire protection systems and life safety systems need to be maintained during alterations.

Florin: Questions or concerns from the group?

Dustin: As we have talked about earlier, alterations are governed by the Existing Building Code, not necessarily the SFPC. We are primarily concerned about continuity of fire protection and life safety systems while the buildings are being occupied. It sounds like this is sort of crossing over a little bit in to the Existing Building Code realm and also puts a blanket requirement on the contractor for the fire protection and life safety systems.

Andrew: We can certainly add the words, "in the occupied structure." If there is a better reference to the Existing Building Code, we would be happy to do that. If we wanted to add the words, "Occupied building or structure," that would be appropriate.

Dustin: Would like to take a little time to think about this and look at the Existing Building Code. Dustin will send Andrew some suggested notation to change a little bit.

Other

Florin: Does anyone have any ideas of suggestions for the group as to what we should bring up next?

Ron: Suggests that it might be worth going through the tent provisions. The construction code and fire prevention code are not consistent.

Dustin: There are some differences between the SFPC and the IFC. The construction code for temporary structures does not really go into much detail at all – it refers back to the IFC. That would be a worthwhile endeavor.

Assignments and Next Steps

Florin: The only assignment falls on DHCD staff to compile these proposals into cdp VA. As far as what Ron brought up, we could compare the SFPC and IFC to come up with a better solution than we have.

Jeff: That is a great idea. We recognize there are some conflicting requirements for permits and approvals. What we can do is go back after this meeting and try and see the best way to handle it and then reach back out to the group. We might try to squeeze a meeting in before the General Workgroup Agenda. There is one other thing that stuck out, when we updated the scoping for Section 1207, we made it clear that there might be some construction provisions in there that would only be applicable to mobile ESS and then as we went through, we made reference to an IFC section. Jeff wonders if that is a dangerous path to go down since there is a lot of confusion about how the SFPC and IFC go together. There may be provisions in Section 1207 that deal with mobile ESS that we've deleted and we may want to bring those back instead of confusing people by referencing the IFC.

Andrew: We have all struggled with that Ch. 12 section and how we best make it clear. We thought the cleaner approach was to reference the IFC, but, like you said, that may be unprecedented territory and it may be better to add some construction provision in 1207 that are well within the scope of mobile ESS and not to be confused with other ESS. It would take more work to do that, but we will know which sections to do that to since they are referenced as IFC sections now.

Jeff: Any other thoughts? If others agree that referencing the IFC is an issue, we will have to go back and revisit those sections. These will not be on the March agenda, so we have time. We can go through and pull out the ones that reference the IFC and work with Andrew to come up with the alternative. If it is doable, we can have a quick meeting and see if everyone is good with that.

Florin: Just to confirm what Jeff said – of the proposals we heard today, the only ones being heard in March are the three proposals we discussed at the beginning. The spreadsheet that we went through did not make the agenda because the intent was for the group to go through all of these and have consensus items submitted as one proposal. Those will be heard at the following General Workgroup meeting.

Jeff: The cutoff for that is March 12th, so we would have to figure all of this out before March 12th to make any adjustments to this spreadsheet and get that consensus proposal submitted. It is doable and can hopefully be done without many changes. Jeff asks for thumbs up from the group – all present sub workgroup members are in agreement. That is another piece of homework that we will work on. We will look to have that meeting a week before March 12th to give us time to finalize the proposal and get it submitted in cdp VA.

Florin: Does anyone else have anything else for the good of the order? If not, a big thank you on behalf of DHCD for your work. We appreciate it and Virginia codes would not be where they are without your work.