

Future of Community Risk Reduction on Transient Public Lodging Establishments (“TPLE’s”)

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History in the Fire Service

Over 34 Years in the
Fire Service
Held Every Rank in the
Fire Service

Company officer in 3
NW Florida
Departments to
include Captain &
Battalion Chief.

Became Fire Chief in
2018.



Fire Chief

Certified District Manager

State Certified:

Firefighter

Hazmat Technician

Rope & Rescue Operator

Instructor 3

Pump Operator

Confined Space

Live Fire Instructor

Paramedic

Fire Chief

Primary advocate for
public safety

Primary advocate for
first responders' safety

OBJECTIVES

By the end of this presentation, you should know:

- What is a Transient Public Lodging Establishment (“TPLE”)
- Understand your enforcement responsibilities relating to TPLE’s
- Impact TPLE’s are having on Authority Having Jurisdiction (“AHJ”) (aka Fire Chief)
- Effective ways to implement enforcement of TPLE’s

Navarre Beach Fire Rescue District (4 sq. miles)





Welcome to
Navarre
Beach

Navarre Beach





Navarre Beach Fishing Pier, Courtesy of Santa Rosa County Tourist Development



Navarre Beach Reefs, Navarre Press, Sept. 23, 2024, Hansen Hasenberg



Navarre Beach – July 2025



Navarre Beach Fire Rescue District





Navarre Beach Fire Rescue Lifeguard Headquarters – July 2025

The vacation rental market is booming!

Key Attractions that Promote Growth on Navarre Beach:

- Proximity to the Beach and Water Activities
- Longest Fishing Pier in the Gulf of America (approx. 300,000 visitors, annually)
- Artificial Reefs in the Santa Rosa Sound & Gulf of America
- Turtle Conservation Center (approx. 63,000 visitors, annually)
- National Champion Beach Safety Program



Reasons for Increase in TPLE's:



- Increased rental market prices hotels/motels
- Tourist Development Office
- Chamber of Commerce
- Multiple Families Vacationing Together

Fire District's Role:



- Fire Chief - primary advocate for public and first responders' safety
- All things being equal = flourish
- Mutual exclusivity = safety/profitability

Define Transient Public Lodging Establishment (TPLE)

What is TPLE?

- Part 1 of Florida State Statute 509, Public Lodging and Public Food Service Establishments.
- 509.013(4)(a)(1) “Transient public lodging establishment” means any unit, group of units, dwelling, building, or group of buildings within a single complex of buildings that is rented to guests more than three times in a calendar year for periods of less than 30 days or 1 calendar month, whichever is less, or which is advertised or held out to the public as a place regularly rented to guests.

What is a “Vacation Rental”?

- Florida Statute 509.242(1)

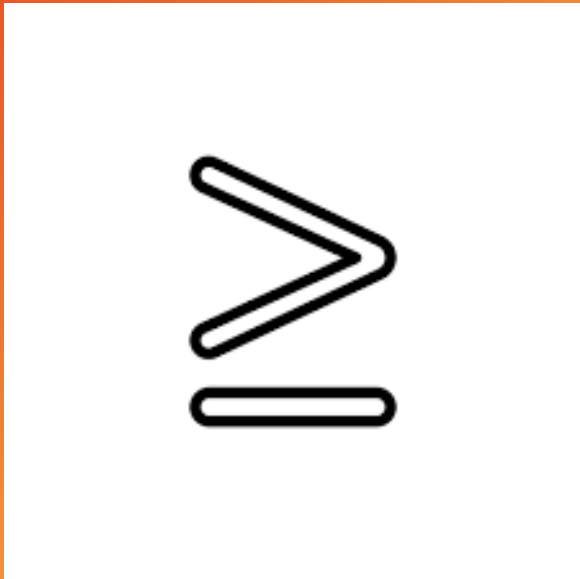
- **1) A public lodging establishment shall be classified as a hotel, motel, bed and breakfast inn, or *vacation rental* if the establishment satisfies the following criteria:**

- (c) Any unit or group of units in a condominium or cooperative or any **individually** or collectively **owned single family**, two family, three family, or four family house or dwelling unit that is also a **transient public lodging establishment...**



Using the correct language

- Not all vacation rentals are transient public lodging establishments.



Who Licenses TPLE's?

- Department of Business and Professional Regulations (DBPR)
 - Division of Hotels and Restaurants.





FLORIDA
ADMINISTRATIVE
CODE
69A

633.206 Uniform firesafety standards.—The Legislature hereby determines that to protect the public health, safety, and welfare it is necessary to provide for firesafety standards governing the construction and utilization of certain buildings and structures. The Legislature further determines that certain buildings or structures, due to their specialized use or to the special characteristics of the person utilizing or occupying these buildings or structures, should be subject to firesafety standards reflecting these special needs as may be appropriate.



2023 Florida Statutes
Chapter 633
Fire Prevention & Control

633.208 Minimum firesafety standards.—

(1) The Florida Fire Prevention Code adopted by the State Fire Marshal, which shall operate in conjunction with the Florida Building Code, shall be deemed adopted by each municipality, county, and special district with firesafety responsibilities. The minimum firesafety codes do not apply to buildings and structures subject to the uniform firesafety standards under s. 633.206 and buildings and structures subject to the minimum firesafety standards adopted pursuant to s. 394.879.

Florida Statute
633.208
Minimum Fire
Safety
Standards

Florida Fire Prevention Code

Eighth Edition

Jimmy Patronis
Chief Financial Officer
State Fire Marshal



Florida Statute 633.208 Minimum Fire Safety Standards

FFPC adopted by the State Fire Marshal...shall be deemed adopted by each municipality, county, and special district with fire safety responsibilities.

Each municipality, county, and special district with fire safety responsibilities **shall** enforce the FFPC.

Florida Statute 633.208 Minimum Fire Safety Standards

- What if I said, “I’ll enforce Chapter 16, New Day-Care Occupancies, but not Chapter 31, Existing Apartment Buildings.” What would your response be?
- How about, “I’ll enforce Chapter 12, New Assembly, but not Chapter 37, Existing Mercantile Occupancies.” Your response to that?
- Indiscriminate? Arbitrary?
- Would my decision/s be inconsequential?

Florida Statute
633.206
Uniform Fire Safety
Standards



FLORIDA
ADMINISTRATIVE
CODE
69A

Florida Statute 633.206 Uniform Fire Safety Standards

The Legislature hereby determines that to protect the public health, safety, and welfare it is necessary to provide for life safety standards...

The legislature further determines that certain buildings or structures, due to their **specialized** use or **special** characteristics...should be subject to fire safety standards reflecting these **special** needs.

(1)The Department of Financial Services shall establish uniform fire safety standards that apply to:

(b)All new, existing, and proposed hospitals, nursing homes, assisted living facilities ...**transient public lodging establishments**.

Possible
Fire Risks
and
Hazards
Special to
TPLEs

Transient Population (new guests unfamiliar with property)

Often not built or modified to commercial standards

Potential for overcrowding or use beyond intended purpose

Inconsistent application of safety features (smoke detectors, fire extinguishers, etc.)

Florida Statute 633.206 Uniform Fire Safety Standards

(1)(b) State Legislature mandates Local Fire Jurisdictions protect the health, safety, and welfare of “all new, existing, and proposed... nursing homes, assisted living facilities, adult family-care homes... transient public lodging establishments...”

(2)(b) All such local authorities shall enforce, within their fire safety jurisdiction, the uniform fire safety standards for those buildings specified in paragraph (1)(b)

What codes do we use to enforce?

- Florida Administrative Code Chapter 69A-43-Uniform Fire Safety Standards for Transient Public Lodging Establishments, Timeshare Plans, And Timeshare Unit Facilities’.
- 69A-43.018 One- and Two-Family Dwellings, ...Licensed as transient public lodging establishments, use Chapter 24 of Florida Fire Prevention Code is prescribed, except as modified by 69A-43.
- For Three-family and four-family dwellings licensed as transient public lodging establishments shall comply with Chapter 28, New Hotels and Dormitories or Chapter 29, Existing Hotels and Dormitories, of FFPC.

Inconsequential?

- (5) The State Fire Marshal may deny, refuse to renew, suspend, or **revoke the certificate of a fire safety inspector** if the State Fire Marshal finds that any of the following grounds exist:
- (f) **Failing to properly enforce** applicable fire codes...

Florida Statute 633.216(5)(f)

TPLE's impact on AHJ's resources


Statistics in Navarre Beach Fire Rescue District

100%

In the past 3 years on Navarre Beach, we've had four structure fires at residential structures.

Of those four, 4 were in vacation rentals.

Economic Impact...



[Overview](#) [Amenities](#) [Host](#) [Policies](#)

Entire home

Forever Sunsets w/ Private Temp Controlled Pool, Elevator & **Sleeps 30** in beds

Family-friendly vacation home in Navarre with an outdoor pool

10 Exceptional

[See all 4 reviews](#) >

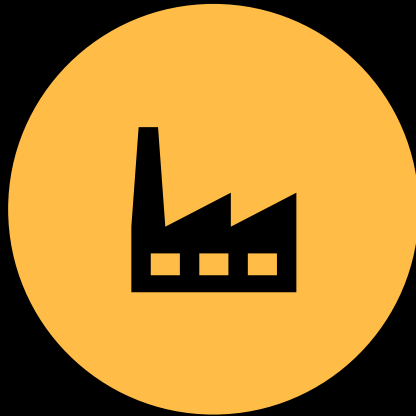
✓ Your dates are available

Start date Jul 4 End date Jul 11

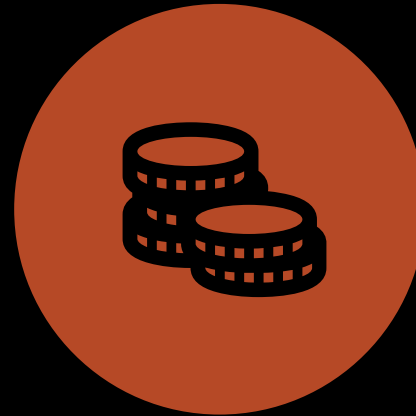
Travelers 2 travelers

\$3,886
\$27,205 for 7 nights
✓ All fees included

Economic Recap



BOOMING TPLE INDUSTRY



DESPITE OVERALL
ECONOMY



TPLE INCREASED DEMAND
FOR AHJ RESOURCES

Yeah, but we
don't have
the
resources!

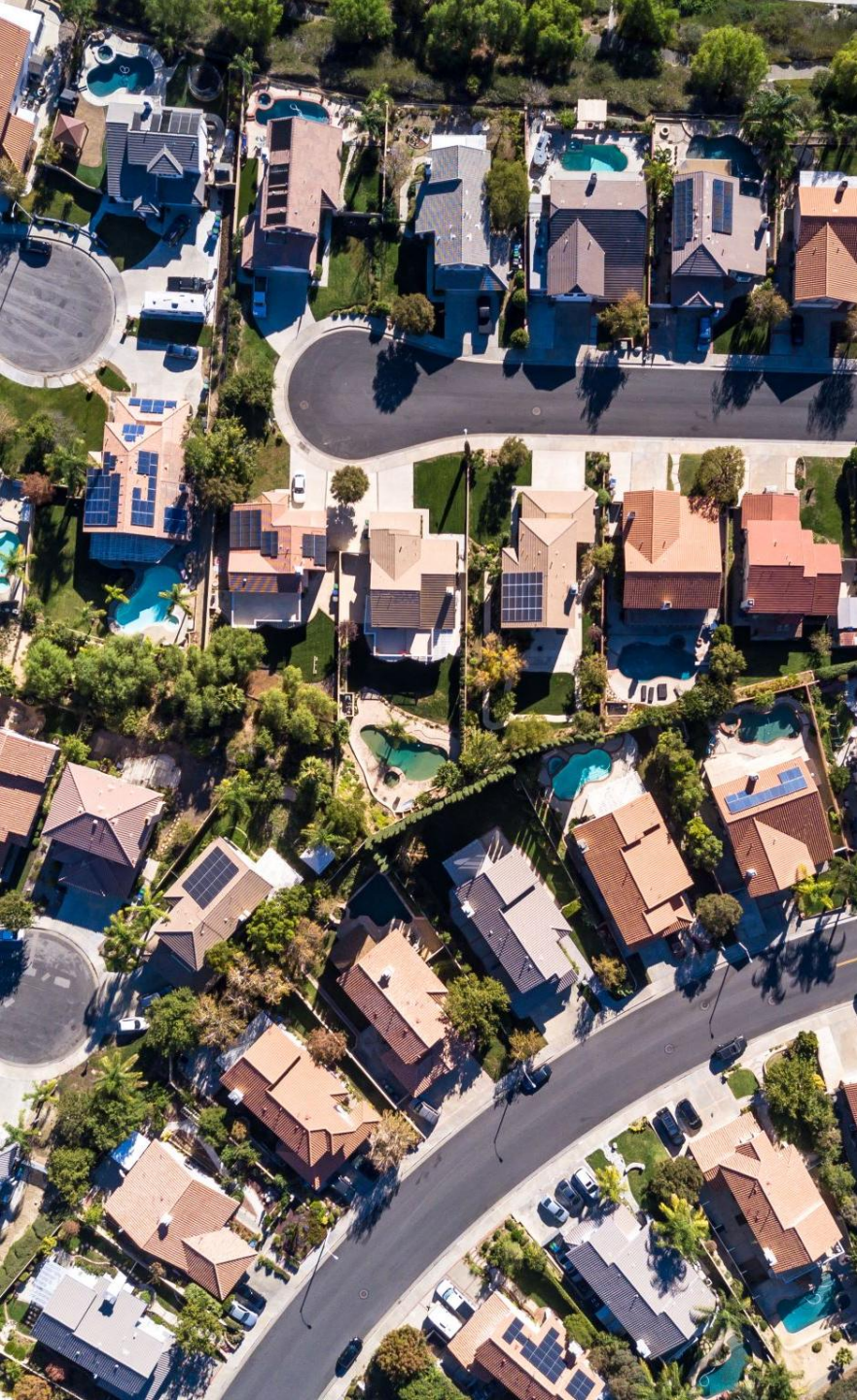


Video

https://youtu.be/G9qmMhtNGEs?si=ffd07nDtP0L_XShm


HOLLYWOOD

NFPA 1710, The Industry Standard for Career Fire Departments, YouTube



Navarre Beach Fire Rescue is a non ad valorem assessment district.

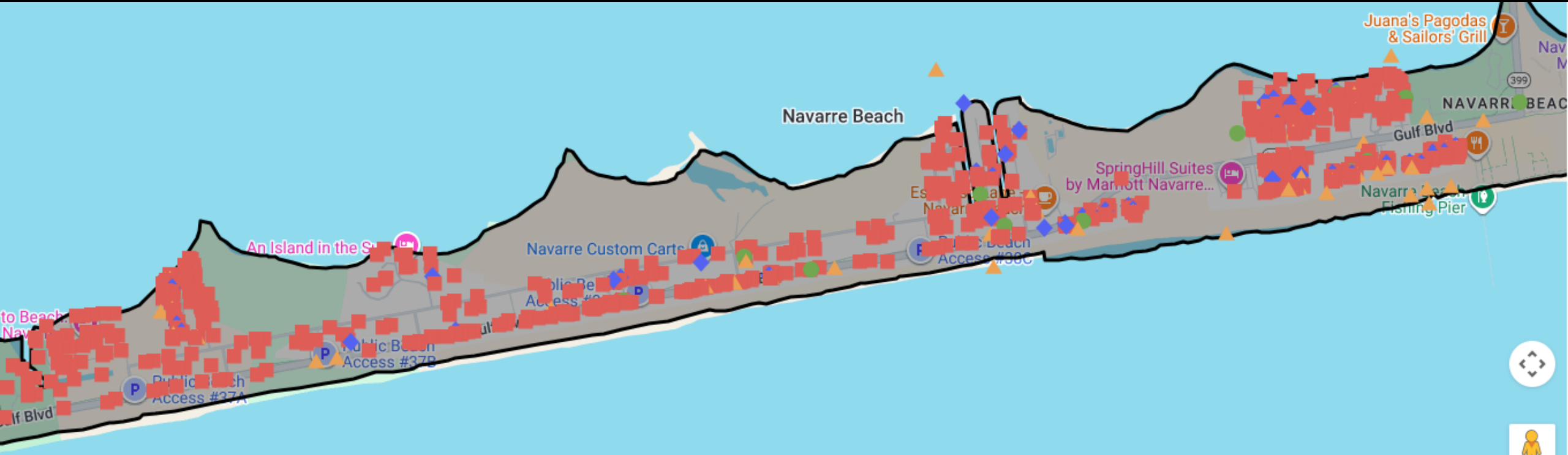
- Residential: \$537.40
- Non-Residential/Commercial: \$0.44 per sq. ft.
- Vacant Land: \$67.71



NBFR will receive
approximately \$500K
in fiscal year 2027
from the
reclassification of the
TPLE properties



Navarre Beach Fire Rescue District has approximately 1,200 Vacation Rentals



Short-term rentals in Navarre Beach Fire Rescue District

Effective ways
to implement
TPLE
enforcement?



FS 633.202(6)

- “The Florida Fire Prevention Code does not apply to, and no code enforcement action shall be brought with respect to, zoning requirements or land use requirements.”

NBFR TPLE Inspections:

- . The focus will be on renter's safety.
- . Scheduled at the convenience of the owner or rental agent.
- . Minimal interruption to your rental business.
- . No charge for the inspection.

NBFR Inspection Checklist:

STREET NUMBERS:

- A street number shall be visible from the street (with contrasting colors) [NFPA 101 Ch 4.6.1.2]

FIRE EXTINGUISHER(S):

- Minimum – size 2A-10BC or as required by code [69A-43.018(7)]
- Shall have current inspection certification [69A-43-018(7)]
- Must be mounted no higher than 5 ft high and no lower than 4 ft above floor [NFPA 10 Ch 6.1.3.8.1, 6.1.3.8.3]
- Shall be in a conspicuous location and unobstructed [NFPA 10 Ch 6.1.3.1]
- Fire extinguishers shall be located so that the maximum travel distances shall not exceed 75 ft [NFPA 10 Ch 6.2.1.2.2]

ELECTRICAL:

- All circuits shall be identified, blanks in all unused circuits [NFPA 101 Ch 4.6.1.2]
- Extension cords shall not be used as permanent wiring [NFPA 101 Ch 4.6.1.2]

EGRESS:

- Keep primary and secondary exits clear and unobstructed [69A-43-018(4)(b), 69A-43.018(4)(c)1]

NBFR Inspection Checklist Cont.:

OTHER ITEMS:

- Transient Public Lodging Establishment License [69A-43.001, 69A-43.003]
- Contact numbers and procedures for reporting an emergency [69A-43.018(9)]
- Floor diagram: floor arrangement, primary and secondary exit locations, room identification and posted in a conspicuous location [69A-43.018(8)]

EMERGENCY LIGHTS:

- Battery powered emergency lighting shall be provided for a period of no less than one (1) hour to illuminate the primary exit [69A-43.018(6)]

SMOKE ALARMS:

- Working alarms shall be in each bedroom, one in common area of house, and one in hallways outside of bedrooms [NFPA 101 Ch 24.3.4.1]
- CO alarms in dwellings with gas appliances and/or attached garages (on every level) [Ch 24.3.4.2.1(1)(2)]
- **(Note: Additional items may be required per Florida Administration Code 69-A-43)**

QUESTIONS & COMMENTS

Navarre
Beach



References

- The Florida Senate, Florida Statutes
- Florida Department of Business & Professional Regulation (“DBPR”)
- The Florida Fire Prevention Code, State Fire Marshal
- VRBO
- Granicus
- NFPA 1710, *The Industry Standard for Career Fire Departments*, YouTube, 2020