

Memorandum



Date: May 31, 2022
To: Honorable Chairman Jose “Pepe” Diaz
and Members, Board of County Commissioners
From: Daniella Levine Cava *Daniella Levine Cava*
Mayor
Subject: Report on Crowd Control Policy and Permitting System at Public and Private
Venues Within the Incorporated and Unincorporated Areas of Miami-Dade
County – Directive 220693

The following information is provided in response to Resolution No. R-222-22, sponsored by Commissioner Danielle Cohen Higgins and adopted by the Board of County Commissioners on March 1, 2022, directing the County Mayor or County Mayor’s designee to formulate and propose a crowd control policy and permitting system for large events at public and private venues within the incorporated and unincorporated areas of Miami-Dade County and to provide a report. The report was created with input from Miami-Dade Fire Rescue (MDFR), Miami-Dade Police (MDPD), and Regulatory and Economic Resources (RER) Departments, facilitated by the Office of Emergency Management (OEM).

SUMMARY

The planning and permitting of large events in Miami-Dade County requires coordination between Fire Rescue, Police, permitting agencies, other stakeholders, and event organizers to ensure the safety of those in attendance. While requirements governing Fire Rescue’s involvement in the planning process are outlined in the Florida Fire Prevention Code (FFPC), an opportunity exists to enhance procedures by codifying additional requirements, such as the submittal of a comprehensive plan that incorporates law enforcement, public works, permitting agencies, sanitation, etc. The plan would require approval by the agencies involved as a condition for approval of any permit.

The Florida Fire Prevention Code currently requires a Life Safety Evaluation for assembly occupancies with an occupant capacity exceeding 6,000 persons or for special outdoor events, carnivals, and fairs, when deemed necessary due to the capacity, activity to be conducted, or special circumstances. The requirements for the Life Safety Evaluation are described in the Code and include conditions such as crowd movement, management of medical emergencies, fire hazards, severe weather, etc., (FFPC NFPA 1: 10.14.3.2/NFPA 101: 12.4.1). The recommendation is to expand the submittal requirement to incorporate evaluation of conditions related to law enforcement, sanitation, permitting, etc. A pre-event safety meeting with all stakeholders and a final walkthrough with Fire and Police personnel must be held before the event. During the event, an accurate account of the occupancy number must be recorded and made available to Police and Fire personnel upon request.

The following sections detail the current procedures in place regarding the event planning and permitting requirements, followed by recommendations of procedures to codify the process.

BACKGROUND

Event Planning and Permitting

Sections 14-39 and 14-63 of the Code of Miami-Dade County contain requirements for permitting of occupancies and special events and for the provision of stand-by fire, rescue, and/or inspection services. MDRF’s Fire Engineering Bureau is charged with reviewing and determining approval of plans submitted to determine compliance with the current edition of the FFPC. This includes assuring that any temporary structures are safe and that the venue has sufficient exits, exit capacity, and lighting. MDRF also determines the appropriate number of certified Crowd Managers and Crowd Manager Supervisors that will be needed for an event. Applicants are required to provide proof that the appropriate number of personnel have been hired to fill the necessary roles during the event. In a concert setting, MDRF considers engineered/control techniques used to prevent overcrowding and crush injuries such as metering equipment; adding barriers for separation; establishing breakout areas to ease a potential crush situation; and requiring enough trained Crowd Managers to assist, as determined by the Code. Depending on the expected energy of the event and time of day, MDRF may require the event organizer to provide available water and misting systems to keep the crowd hydrated.

It has been MDRF and RER’s experience that plans for special events are not submitted with sufficient notice to perform the required reviews. The recommendation is to require a plan submittal for large events at least 60 days before the event date.

Standby Emergency Services and Fire-Watch personnel and equipment

After plans are approved, MDRF Fire Engineering Bureau and the MDRF Special Events Bureau will determine the number of MDRF personnel and equipment that will be required.

Crowd Managers & Crowd Manager Supervisors

Crowd Managers are specially trained personnel, hired by event organizers to assist in the control and movement of crowds. In accordance with Section 14-65, MDC, Crowd Managers must possess a training certificate issued during the preceding two years. The Florida Fire Prevention Code requires one Crowd Manager or Crowd Manager Supervisor for every 250 occupants. The training for the duties and responsibilities of the Crowd Manager and Crowd Manager Supervisor must be documented in the written Safety Plan.

Site Inspection

MDRF’s Fire Prevention Division performs all required inspections to confirm compliance with the Code and the approved Life Safety Evaluation. MDRF Special Events Bureau coordinates with the venue for billing of all Standby Emergency Services and Fire-Watch personnel.

Law Enforcement

Currently, the on-site presence of law enforcement can vary between venues and events. In some instances, event organizers may opt for private security on-site, and County/Municipal Police may have little or no involvement in the planning process or participation for a particular event. To ensure

there is no gap between the private security and County/Municipal Police a recommendation by MDPD and MDFR is outlined in the “Procedures for the Board to Consider Codifying” section below.

Incident Command

Incident Command planning is conducted prior to the event. The level of Event/Incident Command structure is based on the scope of the event and the participation of other agencies. Every planned event will have the initial incident command structure in place to build upon. If needed, the initial structure can be turned into a larger Incident Command System (ICS).

RECOMMENDATIONS

Recommended procedures for the Board to Consider Codifying

In addition to the existing requirements of the FFPC, the opportunity exists to enhance current permitting and planning processes within Miami-Dade County by requiring an Event Safety Plan that requires approval by MDPD (or the law enforcement agency having jurisdiction) and other agencies as required, as a condition for the final approval of the permit. Recommended procedures to codify are as follows:

1. Special Events permit applications must be submitted for review at least 60 days before the start of the event for large events and at least 30 days prior for small events. The permit must be issued at least seven days before the start of the event.
2. Implementing Order 4-123 and Section 8CC, MDC should be amended to require additional fees when plans submittal deadlines are not met or when permits are not timely obtained.
3. The authority to impose fines on the organizer for non-compliance with the permit requirements should be outlined in a new ordinance, with an accompanying Implementing Order. The same would apply to granting law enforcement the authority to disapprove a private security firm as part of the permitting process.
4. In addition to a Life Safety Evaluation, a separate Event Safety Plan must be submitted for outdoor concerts or large events with a capacity of over 6,000 attendees. The Event Safety Plan must contain:
 - Maps and/or diagrams outlining:
 - Clearly marked unlocked Emergency Exits with assigned staff
 - Clearly marked Entry/Exit points with assigned staff
 - Planned ingress and egress routes
 - An appropriate type of crowd barriers positioned to prevent overcrowding, crushing, and stampedes, which are regulated by Engineers and MDFR or department having jurisdiction, during the permitting process
 - Entry/Exit points

- Medical Station/Unit
- Water stations
- Command post location
- Structures to include, seating, food, beverage, rides, restrooms, etc.
- Emergency back-of-house Fire Lane
- Number of Security Officers, including their roles and responsibilities
- Number of Crowd Managers and a breakdown per assignment
- Extreme Weather Plan
- Capability to immediately silence all music, pyrotechnics, microphones
- Capability to immediately activate all house and emergency lights
- Capability to broadcast and/or announce emergency messages, if needed
- Weapons Policy
- Security screening procedures: Number of entry gates, metal detectors, bag searches, etc.
- Expected crowd attendance
- Drone Policy and Procedures
- Transportation Plan, parking, and ridesharing locations
- Alcohol sales, locations, and times
- Hours of operation to include parking lot opening times, gate times, and performance schedule

For outdoor concerts and large events in Miami-Dade County Parks or handled by MDPD, Event Safety Plans are to be submitted through the RER portal or in person at the Permitting & Inspection Center no later than 60 days before the event, for review and approval. The MDPD Special Events Unit will then determine, with consultation with the organizer, the appropriate Police staffing for the event which is to include:

1. Law enforcement at all public entry/exits
2. An established Unified Command with appropriate stakeholders
3. Special Events Unit personnel on-site to oversee the event and permit compliance
4. Adequate law enforcement personnel to address calls for service, prisoner transport, rapid response, traffic concerns, and safety concerns
5. Appropriate tactical units (Rapid Deployment Force, Special Response Team, Canine Units, Explosive Detection Units, Bicycle Response Units, plainclothes detectives, etc.) and the appropriate command level positions, as needed, based on staffing levels

A pre-event safety meeting with all relative stakeholders must be held before the event after the submission of the required plans. A final safety walk-through must be conducted with Police and Fire personnel within one week of the event to identify and address any safety concerns. Police will conditionally approve the Event Safety Plan, pending the approval of all other applicable requirements and permits (i.e., Miami-Dade Regulatory and Economic Resources Department, Parks, Recreation and Open Spaces Department, and Miami-Dade County Traffic and Engineering Department’s maintenance of traffic plan, etc.).

During the event, an accurate count of the occupancy number must be recorded and made available to Police and Fire personnel upon request. The MDPD Special Events Unit designee, or authority with jurisdiction, will sign the Permit Application upon compliance.

Any failure to comply with the documented actions noted within the approved permit may result in a fine to the permittee or a permit being revoked immediately, thus causing the event to be canceled or immediately stopped. A permit can be revoked by Police and Fire command staff personnel, or designee, if there is a concern for public welfare.

It is not the intent to apply these requirements to permanent structures designed and licensed to hold large-scale events such as stadiums and arenas. However, if the event is being held in a location outside the usual scope of the structure, such as the parking lot of a stadium, these procedures shall apply.

It is noted that certain municipalities have expressed concern over these recommended procedures and the potential impact that they may have on family-friendly events hosted by a municipality.

Implementation Plan and Cohesive Permitting

Any procedural and/or policy changes involving special event permitting should be integrated into the existing RER’s permitting process. RER houses the special events permitting process and reviews plans for such events in the unincorporated areas which include reviews for the building trades, zoning, and MDR. Applications for special events permits in the unincorporated areas would be treated as a “one-stop-shop” where applicants would submit through the RER portal or in-person at the Permitting & Inspection Center. The plans would be distributed, and reviews conducted concurrently by the required disciplines and County agencies. Reviews are “activated” on the intent, scope of the event, and occupant capacity. As the newly implemented Event Safety Plan calls for an active role from MDPD, staff from MDPD will be added to the review process for special event permitting and provide a disposition on the plans within the established timeframes of the process. Special event permits would only be issued once the plans are “approved” by all required disciplines and agencies including MDR and MDPD.

For special events permitting within municipalities with an independent, municipal Fire service, the special event permits process would be contained in their jurisdiction and not come to the County or RER for review. For municipalities where Miami-Dade Fire Rescue does provide services, the plans/permit would be submitted to RER for County. The municipal Building Official should ensure that all appropriate approvals are obtained from their municipal Police Department.

Per Ordinance 14-65, this report shall be placed on the next available Board of County Commissioners Agenda Meeting. Should you have any questions, please contact Charles Cyrille, Interim Director, OEM at (305) 468-5406 or cyrille@miamidade.gov.

c: Geri Bonzon-Keenan, County Attorney
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