

FLORIDA DEPARTMENT OF  
**Business & Professional Regulation**



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**Florida Building Codes**  
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Petition # 172

Submitted By ashley ong  
Date Submitted 03/05/2019  
Comment Toilet facility as defined in FBC Plumbing Section 202 is a room or space that contains not less than one water closet and one lavatory. While FBC Accessibility Section 213.2.1 sets the maximum number of lavatory (not more than one) in a toilet room, the plumbing code sets the minimum requirement of not less than one.

Submitted By ashley ong  
Date Submitted 03/05/2019  
Comment Toilet facility as defined in FBC Plumbing Section 202 is a room or space that contains not less than one water closet and one lavatory. While FBC Accessibility Section 213.2.1 sets the maximum number of lavatory (not more than one) in a toilet room, the plumbing code sets the minimum requirement of not less than one.

Submitted By Richard Schauland  
Date Submitted 03/05/2019  
Comment Section 405.3.2 of the Plumbing Code requires that the lavatory shall be located in the same room as the water closet for employee and public toilet rooms.

Submitted By Gene Boecker  
Date Submitted 03/05/2019  
Comment Regardless of what the provisions of Chapter 11 say, the Florida Plumbing Code will not allow it so it should not be made a binding interpretation. Section 405.3.2 of the FPC states that the lavatory must be location in the same room as the water closet in public toilet rooms. The term "public" is defined. A review of the definition shows that it clearly applies to schools. If you check with the US Access Board about this issue, they will tell you that the reason why there is not comparable language in the 2010 ADA Standards is that they do not include provisions that are clearly addressed within the model codes. A review of the ADA Standards Guidelines will reflect this (e.g., page 105, for unisex toilet rooms).  
[https://www.ada.gov/regs2010/2010ADASTandards/Guidance\\_2010ADASTandards.pdf](https://www.ada.gov/regs2010/2010ADASTandards/Guidance_2010ADASTandards.pdf)

Submitted By Gene Boecker  
Date Submitted 03/05/2019  
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Submitted By Daniel Lacerda Jr  
Date Submitted 03/05/2019  
Comment Section 453.21.2 of the current Code states....."Toilet facilities shall meet accessibility requirements and should open into the instructional space. The toilet may be used by both sexes and SHALL contain a water closet, lavatory and related accessories." How does the Board justify its interpretation tat a water closet is not required within the toilet room when this Code section does?

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