

DEA06-DEC-068

February 20, 2006

Florida Building Commission
Department of Community Affairs
Building Codes and Standards
2555 Shumard Oak Blvd.
Tallahassee, FL 32399-2100

RE: "Petition for Declaratory Statement before the Florida Building Commission."

Petitioner: Jack O. Glenn, CBO
Technical Services Director
Florida Home Builders Association
201 E. Park Ave
Tallahassee, FL 32301

FILING AND ACKNOWLEDGEMENT
FILED, on this date, with the designated
Agency Clerk, receipt of which is hereby
acknowledged.

On Behalf of: Engle Homes, Central Florida Division
11315 Corporate Blvd., Suite 250
Orlando, FL 32817


Miriam Snipes
Deputy Agency Clerk

2/21/06
Date

Reference: Construction of 2 single family dwellings located in New Smyrna Beach, FL

Lot 279 Venetian Bay, a 2579 square foot dwelling with 3 exterior doors, where the front door is 3'0" out swing with landing 3 3/4 inches below finished floor elevation and a pair of rear doors measuring 2"8" with a landing 3 1/2" below the finished floor.

Lot 280 Venetian Bay, a 2579 square foot dwelling with 3 exterior doors, where the front door is 3'0" out swing with landing 4 inches below finished floor elevation and a pair of rear doors measuring 2"8" with a landing 3 1/2" below the finished floor.

AT ISSUE INTERPRETATION OF FBC-R SECTION 311.4.3

Please clarify the intent of Florida Building Code – Residential as it relates to the requirement for a landing without a step at any exterior door of a single family dwelling contained in section R311.4.3. It is my belief one of the reasons for the supplement was an effort to correct the Residential Volume of the code to reflect "Florida Specific Amendments" (see attachment) that were carried forward to the base code update and were include in the Building Volume and not the included in the Residential Volume. The way the language was modified the provision that previously allowed a step down at exterior doors has been removed.

The current interpretation of this section of the code is requiring all exterior doors with a step to be "in swing" doors. Using an in swing door creates problems with water intrusion from wind driven rain. Using an out swing door with a landing at the same level as the finished floor also creates a condition conducive to water intrusion.

From FBC-R 2004

R311.4.3 Landings at doors.

There shall be a floor or landing on each side of each exterior door.

Exception: Where a stairway of two or fewer risers is located on the exterior side of a door, other than the required exit door, a landing is not required for the exterior side of the door.

~~The floor or landing at the exit door required by Section R311.4.1 shall not be more than 1.5 inches (38 mm) lower than the top of the threshold. The floor or landing at exterior doors other than the exit door required by Section R311.4.1 (Exit Door) shall not be required to comply with this requirement but shall have a rise no greater than that permitted in Section R311.5.3.~~

Exception: The landing at an exterior doorway shall not be more than 7¼ inches (196 mm) below the top of the threshold, provided the door, other than an exterior storm or screen door does not swing over the landing.

The width of each landing shall not be less than the door served. Every landing shall have a minimum dimension of 36 inches (914 mm) measured in the direction of travel.

* Language removed by supplement

Question 1: Does a single step down constitute a stairway? If there is a step down at the door must the door be in swing.

Question 2: If the answer to question 1 is yes, is the provision applicable to all exterior doors?

I offer the following as observations:

Section R311.4.3. Landings at doors. There shall be a landing on each side of each exterior door.

This section provides for a landing on each side of an exterior door.

Exception: Where a stairway of two or fewer risers is located on the exterior side of a door, other than the required exit door, a landing is not required for the exterior side of the door.

The exception provides up to 2 risers (15 ½ inches)

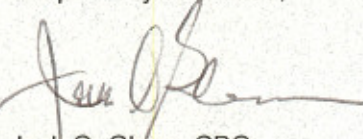
"The floor or landing at exterior doors shall not be required to comply with this requirement but shall have a rise no greater than that permitted in Section R311.5.3."

Where, Section R311.5.3 allows a step down of 7 ¼ inches the landing may be up to 7 ¼ inches below the top of the threshold.

Exception: The landing at an exterior doorway shall not be more than 7¼ inches (196 mm) below the top of the threshold, provided the door, other than an exterior storm or screen door does not swing over the landing. The width of each landing shall not be less than the door served. Every landing shall have a minimum dimension of 36 inches (914 mm) measured in the direction of travel."

This section provides the step down not exceed 7 ¼ inches if the door swing is out.

Respectfully submitted,



Jack O. Glenn, CBO
Technical Services Director
Florida Home Builders Association

Attachment

From FBC 2001 (Florida Specific Amendment)

§1012.1.3 The elevation of the floor surfaces on both sides of a door shall not vary by more than 1/2 in. (13 mm). The elevation shall be maintained on both sides of the doorway for a distance at least equal to the width of the widest leaf. Thresholds at doorways shall not be more than 1/2 in. (13 mm) in height. Raised thresholds and floor level changes more than 1/4 in. (6.4 mm) at doorways shall be beveled with a slope not steeper than 1:2.

EXCEPTIONS:

1. In one-and two-family dwellings where the door discharges to the outside or to an exterior balcony or exterior exit access, the floor level outside the door shall be permitted to be one step lower than the inside, but not more than 8 in. lower.

2. For exterior doors serving dwelling units, thresholds at doorways shall not exceed the height required to pass the water resistance test of ANSI/AAMA/WDMA 101/I.S.2, or TAS 202 for High Velocity Hurricane Zone, or the maximum allowable height difference between interior floor level and exterior floor level shall comply with the following:

Level Difference (inches)	At Primary Door
0	Pervious Construction (e.g. wood decking with spaces)
1/2	Impervious Construction (e.g. concrete, brick, or flagstone)
Level Difference (inches)	At Secondary Door
1/2	Pervious Construction
4	Impervious Construction

3. In one-and two-family dwellings, a door at the top of a stair shall be permitted to open directly at a stair provided the door does not swing over the stair and the door serves an area with an occupant load of fewer than 50 persons.