

**Issue: DS 2022-025:** The petitioner Manuel Z. Lopez, P.E., Deputy Building Official of the City of Coral Gables is seeking a declaratory statement on whether a 6" step at the main egress door of the attached plan violate section R311.3.1 of the 7<sup>th</sup> Edition (2020) Florida Building Code, Residential.

Petitioner seeks clarification of the following question:

Question:

Does the 6" step at the main egress door of the attached plan violate section R311.3.1 of the 2020 FBC Residential?

**Background:**

The petitioner states that in his plan review of single family homes, he encounters quite often an issue relating to Section R311.3.1 which reads as follows:

**R311.3.1 Floor elevations at the required egress doors.**

Landings or finished floors at the required egress door shall not be more than 1 ½ inches (38 mm) lower than the top of the threshold.

**Exception:** The landing, or floor on the exterior side shall not be more than 7 ¾ inches (196 mm) below the top of the threshold.

According to the petitioner, this section first appeared in the 2010 Florida Building Code, Residential as follows:

*Floor elevations at the required egress door. Landings or floors at the required egress door shall not be more than 1 ½ inches {38 mm} lower than the top of the threshold.*

*Exception: The exterior landing or floor shall not be more than 7 ¼ inches (196 mm) below the top of the threshold provided the door does not swing over the landing or floor.*

In addition, the petitioner states that Section R311.3.1 is the same however the Exception is different. The sentence "provided the door does not swing over the landing or floor" has been removed. This change was made in the 2014 Florida Building Code, Residential and has remained unchanged until today. The petitioner believes that in making this change to the Exception in 2014 the writers of the Code created a contradiction to Section R311.3.1 since now the Exception seems to override the paragraph above.

**7<sup>th</sup> Edition (2020) Florida Building Code, Residential**

**R311.3.1 Floor elevations at the required egress doors.**

Landings or finished floors at the required egress door shall be not more than 1½ inches (38 mm) lower than the top of the threshold.

**Exception:** The landing or floor on the exterior side shall be not more than 7¾ inches (196 mm) below the top of the threshold.

Where exterior landings or floors serving the required egress door are not at *grade*, they shall be provided with access to *grade* by means of a ramp in accordance with Section R311.8 or a stairway in accordance with Section R311.7.

### **R311.3.2 Floor elevations for other exterior doors.**

Doors other than the required egress door shall be provided with landings or floors not more than 7¾ inches (196 mm) below the top of the threshold.

**Exception:** A top landing is not required where a stairway of not more than two risers is located on the exterior side of the door.

## **Code change “F5415” as approved by the Commission for the 2014 FBC - Residential**

### ***Section R311.3 Floors and landings at exterior doors. Change to read as shown:***

**R311.3 Floors and landings at exterior doors.** There shall be a landing or floor on each side of each exterior door. 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. Exterior landings shall be permitted to have a slope not to exceed 1/4 unit vertical in 12 units horizontal (2-percent).

**Exception:** Exterior balconies less than 60 square feet (5.6m<sup>2</sup>) and only accessible from a door are permitted to have a landing less than 36 inches (914 mm) measured in the direction of travel.

**R311.3.1 Floor elevations at the required egress doors.** Landings or finished floors at the required egress door shall not be more than 1½ inches (38 mm) lower than the top of the threshold.

**Exception:** The landing or floor on the exterior side shall not be more than 7-3/4 inches (196 mm) below the top of the threshold ~~provided the door does not swing over the landing or floor.~~

Where exterior landings of floors serving the required egress door are not at grade, they shall be provided with access to grade by means of a ramp in accordance with Section R311.8 or a stairway in accordance with Section R311.7.

**R311.3.2 Floor elevations for other exterior doors.** Doors other than the required egress door shall be provided with landings or floors not more than 7-3/4, inches (196 mm) below the top of the threshold.

**Exception:** A landing is not required where a stairway of two or fewer risers is located on the exterior side of the door, ~~provided the door does not swing over the stairway.~~

**[F5415 AS]**

## **Staff Analysis**

**Question:** Does the 6" step at the main egress door of the attached plan violate section R311.3.1 of the 2020 FBC Residential?

**Answer:** The answer to the Petitioner's question is no. As per the exception in section R311.3.1 of the 7<sup>th</sup> Edition (2020) Florida Building Code, Residential, the 6" step in question is within the permitted threshold height of 7-3/4 inches.