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July 2, 2019

**Via Electronic Mail**

Mr. Thomas Campbell  
Executive Director  
The Florida Building Commission  
2601 Blair Stone Road  
Tallahassee, FL 32399

Re: Mod 8224-A1 – Request to Remove from Florida Building Commission  
Consent Agenda (August 13-14, 2019) and to Consider Proposed  
Amendment to Mod 8224-A1

Dear Mr. Campbell:

On behalf of my client, the Florida Restaurant & Lodging Association, Inc. (FRLA), I am writing today to respectfully request that the Florida Building Commission remove Mod 8224-A1 from the Consent Agenda for its meeting on August 13-14, 2019, and consider at that meeting a proposed amendment to Mod 8224-A1. Mod 8224-A1 (see [Appendix A](#)) involves the maximum height of doorway thresholds, which is addressed in Section 1010.1.7 of the Florida Building Code.

The amendment proposed by FRLA, as explained below, will correct some of the terminology used in Mod 8224-A1 in order to make clear that exterior doorway thresholds in all residential occupancies, not just certain non-transient accommodations, can be as high as necessary to meet the water resistance/intrusion requirements of the Code.

Specifically, FRLA's concern centers on the threshold height for exterior doorways providing access to hotel room balconies. The public is generally accustomed to accessing balconies via sliding glass doors with somewhat higher thresholds, whether in hotel rooms, condo units, or

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apartments. In order to prevent water intrusion per the Florida Building Code, these sliding doors incorporate higher thresholds, as well as water reservoirs at their base.

While Mod 8224-A1 would allow for these higher thresholds to access balconies in the condo or apartment setting, the language used in Mod 8224-A1 could be interpreted as failing to permit those higher thresholds in other residential occupancies like hotels.

If interpreted in this fashion, hotel developers will be driven to install lower threshold, side-hinged exterior doors to access hotel balconies. These side-hinged doors pose a significant safety risk to hotel guests, to the general public, and to neighboring structures, because such doors can swing violently in high-wind conditions and even separate from the building.

Section 1010.1.7 (Thresholds) of the 2017 Florida Building Code generally requires as follows:

Thresholds at doorways shall not exceed 3/4 inch (19.1 mm) in height above the finished floor or landing for sliding doors serving dwelling units or 1/2 inch (12.7 mm) above the finished floor or landing for other doors. Raised thresholds and floor level changes greater than 1/4 inch (6.4 mm) at doorways shall be beveled with a slope not greater than one unit vertical in two units horizontal (50-percent slope).

Section 1010.1.7 then goes on to provide an exception to those maximum doorway threshold heights:

**Exceptions:**

1. In occupancy Group R-2 or R-3, threshold heights for sliding and side-hinged exterior doors shall be permitted to be up to 73/4 inches (197 mm) in height if all of the following apply:

1.1.1. The door is not part of the required means of egress.

2.1.2. The door is not part of an accessible route as required by Chapter 11.

Prior to adoption of the 2017 Code, Section 1010.1.7 of the 2014 Code contained a second exception to the stated maximum doorway threshold heights:

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 zones, or the maximum allowable height difference between interior floor levels

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Apparently, many building officials interpreted “Exception 2” as applying to residential occupancies like hotels, as evidenced by the many Florida hotels in which we have all stayed where balcony access is provided through a sliding door with a raised threshold.

This Florida-specific Exception 2, however, was inadvertently dropped somewhere in the process of adopting the 2017 Code. The omission of Exception 2 was even noted in an informal interpretation of the Code by the Building Officials Association of Florida (BOAF). Notably, in issuing Informal Interpretation Report No. 8259 (see [Appendix B](#)), BOAF, in conjunction with the Florida Building Commission and others, interpreted the previous Exception 2 as applying to residential occupancies like hotels, taking the position that the omission of Exception 2 from the 2017 Code meant that sliding doors accessing hotel room balconies had to comply with the much lower one-half inch threshold height.

Perhaps in response to this identified oversight, the Fire Technical Advisory Committee has proposed re-inserting Exception 2 into Section 1010.1.7 via Mod 8224-A1 (see [Appendix A](#)), evidently assuming that this move will resolve the issue.

Unfortunately, while Mod 8224-A1 does allow for higher sliding door thresholds for balconies in certain residential occupancies, like condo units and apartments, the wording used in Mod 8224-A1 could be interpreted as falling short of remedying this concern for sliding door thresholds on hotel room balconies.

The problem lies in the opening phrase of Mod 8224-A1, which allows doorway threshold heights to be as high as necessary to meet the water resistance/intrusion requirements of the Code for “exterior doors serving dwelling units.”

Under the Code’s definitions in Section 2.02, a “dwelling unit” is a “single unit providing complete, independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking and sanitation.”

While hotels rooms provide very comfortable accommodations, whether they would generally be considered to provide “permanent provisions for living, sleeping, eating, cooking and sanitation” is less than clear.

All doubt on this point could and should be resolved by adding a reference to “sleeping rooms” into Mod 8224-A1 as follows (see [Appendix C](#)):

2. For exterior doors serving dwelling units or sleeping units, thresholds at doorways shall not exceed the height required to pass the water resistance test of AAMA/WDMA/CSA 101/IS.2/A440, or TAS 202 for high-velocity hurricane zones, or the maximum allowable height difference between interior floor levels . . .

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Under the Code's definitions in Section 2.02, a "sleeping unit" is:

A room or space in which people sleep, which can also include permanent provisions for living, eating, and either sanitation or kitchen facilities but not both. Such rooms and spaces that are also part of a dwelling unit are not sleeping units.

Respectfully, there is no material justification for treating buildings containing "dwelling units" differently than those containing "sleeping units" in this context. The public is accustomed to accessing balconies via sliding glass doors with somewhat higher thresholds, whether in hotel rooms, condo units, or apartments. Moreover, an increasing number of "dwelling units," whether in apartment or condo buildings, are being rented out to transient guests on a short-term basis, just like hotel rooms.

Failure to clearly include residential occupancies like hotel rooms within the ambit of Mod 8224-A1 will drive hotel developers to install lower threshold, side-hinged exterior doors on hotel balconies. Not only would such a substitution be more costly, but these side-hinged doors pose a significant safety risk to hotel guests, to the general public, and to neighboring structures, because such doors can swing violently in high-wind conditions and even separate from the building.

Adoption of Mod 8224-A1 with the amendment proposed by FRLA would result in balcony doorway threshold heights that vary based upon the wind speed design requirements for the particular part of state in question, as set forth in Code Section 1609.3. According to an architect we have consulted on this issue, approximate balcony doorway threshold heights would still be modest, e.g., less than 4.25" in South Florida and less than 3" in Central Florida.

In conclusion, for the all the reasons expressed above, the Florida Restaurant and Lodging Association requests that the Florida Building Commission remove Mod 8224-A1 from the Consent Agenda for its meeting on August 13-14, 2019, and consider at that meeting a proposed amendment adding "or sleeping units" to Mod 8224-A1, as set forth above and in Appendix C.

Thank you for your consideration of FRLA's request. We stand ready to provide you with any additional information the Commission may need to evaluate this request.

Sincerely,



Warren Husband

Encl.

**Mod 8224-A1**

**1010.1.7 Thresholds.**

Thresholds at doorways shall not exceed 3/4 inch (19.1 mm) in height above the finished floor or landing for sliding doors serving dwelling units or 1/2 inch (12.7 mm) above the finished floor or landing for other doors. Raised thresholds and floor level changes greater than 1/4 inch (6.4 mm) at doorways shall be beveled with a slope not greater than one unit vertical in two units horizontal (50-percent slope).

Exceptions:

1. In occupancy Group R-2 or R-3, threshold heights for sliding and side-hinged exterior doors shall be permitted to be up to 7-3/4 inches (197 mm) in height if all of the following apply:

- 1.1. The door is not part of the required means of egress.
- 1.2. The door is not part of an accessible route as required by Chapter 11.

2. For exterior doors serving dwelling units, thresholds at doorways shall not exceed the height required to pass the water resistance test of AAMA/WDMA/CSA 101/I.S.2/A440, or TAS 202 for high-velocity hurricane zones, or the maximum allowable height difference between interior floor levels. Exterior floor level shall comply with the following:

| LEVEL DIFFERENCE (inches) | AT PRIMARY DOOR   |
|---------------------------|---|
| 0                         | Pervious construction<br>(e.g., wood decking with spaces)           |
| 1/2                       | Impervious construction<br>(e.g., concrete, brick or<br>flag stone) |
| LEVEL DIFFERENCE (inches) | AT SECONDARY DOOR   |
| 1/2                       | Pervious construction   |
| 4                         | Impervious construction   |



**Informal Interpretation Report  
Number 8259**



**Date** 03/26/2019  
**Report** 8259  
**Edition:** 2017  
**Section** 1010.1.7

**Question:**

Is it the intent of the FBC 6th Edition code section 1010.1.7 Thresholds to limit sliding glass door thresholds to 1/2" at private balconies in hotel rooms (R-1 occupancy)?

**Answer:**

Unfortunately, an Exception contained in the FBC-B 5th Edition (1008.1.7 Exception 2) to address this issue was not brought forth to the FBC-B 6th Edition. The intent of this section is to provide a maximum threshold height for doors, in R-1 the threshold height should be a maximum of 1/2" for all doors.

On 04/16/2019 at 11:07 AM

**Commentary:**

None.

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**Notice:**

The Building Officials Association of Florida, in cooperation with the Florida Building Commission, the Florida Department of Community Affairs, ICC, and industry and professional experts offer this interpretation of the Florida Building Code in the interest of consistency in their application statewide. This interpretation is informal, non-binding and subject to acceptance and approval by the local building official.

**Mod 8224-A1**

**1010.1.7 Thresholds.**

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1.1. The door is not part of the required means of egress.

1.2. The door is not part of an accessible route as required by Chapter 11.

2. For exterior doors serving dwelling units <sup>or sleeping units</sup>, thresholds at doorways shall not exceed the height required to pass the water resistance test of AAMA/WDMA/CSA 101/I.S.2/A440, or TAS 202 for high-velocity hurricane zones, or the maximum allowable height difference between interior floor levels. Exterior floor level shall comply with the following:

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| 1/2                       | Impervious construction<br>(e.g., concrete, brick or<br>flag stone) |
| LEVEL DIFFERENCE (inches) | AT SECONDARY DOOR   |
| 1/2                       | Pervious construction   |
| 4                         | Impervious construction   |