



**Informal Interpretation Report
Number 7859**



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Edition 2014

Section R 320.1.1

Question:

Is it the intent of FBC R 320.1.1 to require a bathroom with 29" clear door in a SFR which first habitable level is rised several feet from grade due to flood hazard? Is it the intent of same section to require a bedroom to have 29" clear door if the accessible bath is inside the bedroom?

Answer

To the first question, no. If the first floor is elevated, it is not on grade level. To the second question, yes.

Commentary:

The way the code is written, it is clear only the bathroom requires a 29" clear opening, however, common sense would be, the intent of the code is to have access to a bathroom with a minimum 29" clear opening, if doors , walls, or other obstructions restrict this on the path to the bathroom, it does not make sense that these doors, walls, or other obstructions would not be required to meet a total clear opening of 29".

With that being said, this is a situation where the lawyers could dispute the decision of the building official. The language contained in R320.1.1 is a duplication of F.S. 553.504 (2).

A statute is to be read and interpreted according to the ordinary meaning of the language, unless further guidance is provided elsewhere in the Code or Statute. Words must be given their plain, ordinary and literal meaning. If the

words are clear, they must be applied, even though the intention may be different.

The Statute and the Code only stipulate the bathroom have a 29-inch door. To conclude the bedroom door must have a 29-inch door is applying the likely intent of the Statute and the Code has an obligation that is not reflected in the text of the requirement.

Notice:

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