



**Informal Interpretation Report  
Number 7860**



**Date** November 14, 2016

**Edition** 2014

**Section** 1007

**Question:**

Is it the intent of the Florida Building Code that the requirements of Section 1007 ACCESSIBLE MEANS OF EGRESS shall apply to R-2 occupancy apartment buildings covered under the Fair Housing Act as Covered Multifamily Buildings? It is my interpretation that only public or common use areas of Covered Multifamily Buildings such as a leasing office or mail room would be required to provide accessible means of egress in accordance with section 1007.

**Answer**

No. Section 1007.1 states - 1007.1 Accessible means of egress required. Accessible means of egress shall be provided in accordance with the applicable sections of the Florida Building Code, Accessibility. Please see the attached commentary for additional explanation.

**Commentary:**

The Florida Accessibility Code for Building Construction (FACBC) does not overrule the requirements of the Fair Housing Accessibility Guidelines (FHAG). The FACBC is for PUBLIC ACCOMMODATIONS and does not venture inside of apartments and condos, or onto the common areas covered by the FHAG. Please review the 12 listings under the definition of Public Accommodation and you will see that inside of condos and apartments are not listed, or covered. The FHAG requirements cover the public and common areas of the project, not the FACBC. Means of egress for FHAG projects are covered by OTHER sections of Chapter 10, but not accessible means of egress. This has been a major misconception between the two requirements of the FACBC and the FHA.

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**Notice:**

The Building Officials Association of Florida, in cooperation with the Florida Building Commission, the Florida Department of Business & Professional Regulation, 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.