

**Issue: DS 2025-010:** The petitioner Jonathan Pierce of Pulte Group is seeking a declaratory statement regarding whether a 20-minute fire-rated attic access hatch is required to access a non-habitable attic space from a garage.

**Petitioner seeks clarification of the following questions:**

Does the Florida Building Code, Residential Eighth Edition (2023), require a 20-minute fire-rated attic access hatch, to access the non-habitable attic space from the garage, as described in Section 2 of this petition for the project in question?

**Background:**

According to the petitioner, the project in question includes a garage that is separated from the residence by walls and ceilings that comply with the dwelling-garage separation requirements of section R302.6 of the 8<sup>th</sup> Edition (2023) Florida Building Code, Residential. Access to the attic space is provided as required by section R807 and is installed in the garage ceiling. The attic area is not habitable, does not contain equipment, and is neither designed nor intended for storage, in accordance with section R301.5.

**8<sup>th</sup> Edition (2023) Florida Building Code, Residential**

**R302.5 Dwelling-garage opening and penetration protection.**

Openings and penetrations through **the walls or ceilings separating the dwelling from the garage** shall be in accordance with Sections R302.5.1 through R302.5.3.

**R302.5.1 Opening protection.**

Openings from a private garage directly into a room used for sleeping purposes shall not be permitted. Other openings between the garage and residence shall be equipped with solid wood doors not less than 1 $\frac{3}{8}$  inches (35 mm) in thickness, solid or honeycombcore steel doors not less than 1 $\frac{3}{8}$  inches (35 mm) thick, or 20-minute fire-rated doors.

**R302.5.2 Duct penetration.**

Ducts in the garage and ducts penetrating the walls or ceilings separating the dwelling from the garage shall be constructed of a minimum No. 26 gage (0.48 mm) sheet steel, 1 inch (25.4 mm) minimum rigid nonmetallic Class 0 or Class 1 duct board, or other approved material and shall not have openings into the garage.

**R302.5.3 Other penetrations.**

Penetrations through the separation required in Section R302.6 shall be protected as required by Section R302.11, Item 4.

**R302.6 Dwelling-garage fire separation.**

**The garage shall be separated as required by Table R302.6.** Openings in garage walls shall comply with Section R302.5. Attachment of gypsum board shall comply with Table R702.3.5. The wall separation provisions of Table R302.6 shall not apply to garage walls that are perpendicular to the adjacent *dwelling unit* wall.

**TABLE R302.6 DWELLING-GARAGE SEPARATION**

SEPARATION	MATERIAL
From the residence and attics	Not less than 1/2-inch gypsum board or equivalent applied to the garage side
From habitable rooms above the garage	Not less than 5/8-inch Type X gypsum board or equivalent
Structure(s) supporting floor/ceiling assemblies used for separation required by this section	Not less than 1/2-inch gypsum board or equivalent
Garages located less than 3 feet from a dwelling unit on the same lot	Not less than 1/2-inch gypsum board or equivalent applied to the interior side of exterior walls that are within this area

For SI: 1 inch = 25.4 mm, 1 foot = 304.8 mm.

### R807.1 Attic access.

Buildings with combustible ceiling or roof construction shall have an *attic* access opening to *attic* areas that have a vertical height of 30 inches (762 mm) or greater over an area of not less than 30 square feet (2.8 m<sup>2</sup>).

The vertical height shall be measured from the top of the ceiling framing members to the underside of the roof framing members.

The rough-framed opening shall be not less than 22 inches by 30 inches (559 mm by 762 mm) and shall be located in a hallway or other location with *ready access*. Where located in a wall, the opening shall be not less than 22 inches wide by 30 inches high (559 mm wide by 762 mm high). Where the access is located in a ceiling, minimum unobstructed headroom in the *attic* space shall be 30 inches (762 mm) at some point above the access measured vertically from the bottom of ceiling framing members. See Section M1305.1.3 for access requirements where mechanical *equipment* is located in *attics*.

### Staff Analysis

#### Question:

Does the Florida Building Code, Residential Eighth Edition (2023), require a 20-minute fire-rated attic access hatch, to access the non-habitable attic space from the garage, as described in Section 2 of this petition for the project in question?

#### Answer:

##### Option #1/Petitioner:

No, the Florida Building Code, Residential Eighth Edition (2023), does not explicitly require a 20-minute fire-rated attic access hatch in the ceiling of a garage in a one-family dwelling. Section R302.6 of the Code specifies the required fire separation between the dwelling and the garage, including the required fire resistance of walls and ceilings. However, there is no specific provision within the Code mandating that attic access openings in the garage ceiling must have a 20-minute fire-rated door or assembly. Provided that the garage ceiling complies with the required fire-resistant construction, the inclusion of a fire-rated attic access is not a requirement.

##### Option #2/Staff:

The answer to the Petitioner's question is yes. Pursuant to Table R302.6 of the Florida Building Code, Residential, 8<sup>th</sup> Edition (2023), a garage ceiling separation of not less than 1/2-inch gypsum board or equivalent, applied to the garage side, is required from the attic in question. Since the garage ceiling must be a minimum of 1/2-inch gypsum board or equivalent, the attic access hatch, which is a component of the garage ceiling in question must also be 1/2-inch drywall or equivalent (20-minute fire rated attic access.)