

**ADVISORY COMMITTEE COMMENT FORM**  
**FOR PROPOSED CODE CHANGES**  
(This form must be submitted electronically)

**IRC-3, R302.5.1(REV 2-17-2012)**

*Author/requestor:*     **1309 Committee (2-14-2012 meeting)**

*Email address:*

*Telephone number:*

*Firm/Association affiliation, if any:*

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**Proposed Code Change - Language**

**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 1-3/8 inches (35 mm) in thickness, solid or honeycomb core steel doors not less than 1-3/8 inches (35 mm) thick, or 20-minute fire-rated doors, ~~equipped with a self-closing device.~~

**Proposed Code Change – Need and Reason**

The requirements for a self-closing device on doors between the house and garage, has been all previous model code documents until the adoption of the 2006 IRC. The language requiring the self-closing device was specifically omitted in the 2006 IRC but resurfaces in the 2012 IRC code document. Self-closing devices for this door assembly has always provided a false sense of security and fire safety for the homeowner. In most cases the self-closing device failed to close the door completely enough to actually latch the door securely. An unlatched door provides as much safety to the occupants as not having the door at all if a fire should occur. It was assumed when this code provision disappeared in the 2006 IRC it was intended to force the occupants to physically close the door completely and latch behind themselves, as we do when entering the front door of a home.

The effort to require closers on garage doors continued at the national level every year for perhaps fifteen years or more. Each year the membership denied the request because there was no statistical data to support the requirement.

One of the results of subsidies for attendance to the hearings resulted in this code change being approved. There was no justification for the change and no evidence that a problem exists. Following is the justification from the fire service for the change published in the monograph.

**Reason:** There are times when proposed code submittals require a very lengthy substantiation, and then there are times when code change proposals just make sense. I would believe this is one of those times where a code change proposal makes a lot of sense. We are seeking a requirement to install items for very minimal costs yet great life saving potentials.

If it “just makes sense”, then there should be a justifiable reason for the requirement. If there is no reason, then it is overregulation. Minnesota has not had such requirements in the past and it has not created any issues with increased fire losses. The presumption that the door between the house and garage will be left open is not rational, particularly with the cold winters that occur in Minnesota. There is no evidence that the cost is minimal, that the benefit is real, or that any life saving would occur. Closers require maintenance and can easily be defeated by the homeowner. There is no standard specified in the code. It is obvious that there was no thought put into the proposal regarding the practicality, the need, or the ability to enforce. The closing force to engage the lock on a gasketed door can potentially be a hazard to young children who may get knocked over by the door or get fingers pinched in the closing side of the door or the latch side of the door upon closing. The vague language provides little guidance to install or approve these devices which can result in

greater liability for the builder Minnesota has permitted garage doors without closers for more than 30 years with no apparent problem.

The proposal is necessary because it eliminates a potential for injury to small children, there is no indication in Minnesota that there is a need for this rule, and it eliminates a source of potential liability for builders.

The proposal is reasonable because it does not impose unnecessary and unjustified requirements on the public.

**Proposed Code Change – Cost/Benefit Analysis**

This proposal will reduce construction costs.

## Other Factors to Consider Related to Proposed Code Change

1. Is this proposed code change meant to:

change language contained in a published code book? If so, list section(s).  
2012 IRC R302.5.1

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

delete language contained in a published code book? If so, list section(s).

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

neither; this language will be new language, not found in the code book or in Minnesota Rule.

2. Is this proposed code change required by a Minnesota Statute or new legislation? If so, please provide the citation to the Statute or legislation.  
No

3. Will this proposed code change impact other sections of a published code book or of an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.  
No

4. Will this proposed code change impact other parts of the Minnesota State Building Code? If so, please list the affected parts of the Minnesota State Building Code.  
No

5. Who are the parties affected or segments of industry affected by this proposed code change?  
Code officials, building designers, contractors, homeowners

6. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.  
No

7. Are you aware of any federal requirement or regulation related to this proposed code change? If so, please list the regulation or requirement.  
No