



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Karen Gridley

Date: 4/4/2024

Email address: karen.gridley@state.mn.us

Model Code: IBC

Telephone number: 652-284-5877

Code or Rule Section: 1109.2 Assembly Area Seating (new)

Firm/Association affiliation, if any: CCLD and maintain MN 1341 Section 1108.2.

Topic of proposal: Accept model code language

Code or rule section to be changed: MN 1341, Section 1108.2

Intended for Technical Advisory Group ("TAG"): 1341

General Information

Yes **No**

- A. Is the proposed change unique to the State of Minnesota? Yes No
- B. Is the proposed change required due to climatic conditions of Minnesota? Yes No
- C. Will the proposed change encourage more uniform enforcement? Yes No
- D. Will the proposed change remedy a problem? Yes No
- E. Does the proposal delete a current Minnesota Rule, chapter amendment? Yes No
- F. Would this proposed change be appropriate through the ICC code development process? Yes No

Proposed Language

1. The proposed code change is meant to:

change language contained the model code book? If so, list section(s).

Yes, It will change a portion of the model code Section 1109.2 with an existing MN Amendment.

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

Yes, It will add model language within a MN Amendment. 1341 Subp. 7 Section 1108.2

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

No

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

No

add new language that is not found in the model code book or in Minnesota Rule.

Yes. Adds new language not found in MN Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.

No

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

1109.2 Assembly area seating. A *building* , room or space used for assembly purposes with *fixed seating, bleachers , grandstands or folding and telescopic seating* shall comply with **Sections 1109.2.1 through 1109.2.5.** A *building, room, or space, or lawn seating* used for assembly purposes with *nonfixed seating* shall comply with **Section 1109.2.6.** Assistive listening systems shall comply with **Section 1109.2.7.** Performance areas viewed from assembly seating areas shall comply with **Section 1109.2.8.** Dining areas shall comply with **Section 1109.2.9.**

(**note:** green text = new model code language. Orange = current model language to incorporate within current MN amendment. Purple = current 1341 amendment language.)

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.

No.

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)

This proposed code change is necessary to reinstate the language for bleachers, grandstands and telescopic seating that was removed from the previous model code, creating confusion. The intent was to still require those features to be part of this requirement. The change to the MN amendment is also necessary to clarify that lawn seating is a space that is intended to be covered by the nonfixed seating requirement to have an accessible route leading to the area, such as in built environments such as amphitheatres and outdoor concert areas. The model code language has included “lawn seating” in their language for multiple code cycles so not including it in the MN language implies that MN deleted it or does not require lawn seating to be on an accessible route, which is incorrect. Incorporating “Lawn Seating” within the MN Rule language clarifies the intent.

2. Why is the proposed code change a reasonable solution?
The proposed change is reasonable in order to harmonize MN 1341 with the model code, the Federal ADA and the original intent of the code.

3. What other factors should the TAG consider?
This bleacher language previously existed in the 2015 and earlier MN Accessibility Codes. The lawn seating language has been part of the model code language and is needed within the 1341 amendment language for clarification that these areas are also intended to be covered by the code.

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.

No cost change. The proposed change clarifies the intent of the code that is already being enforced in the intended manner.

2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
N/A
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
N/A
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
N/A
5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
N/A

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Government units such as parks and recreation entities and schools, land developers, entertainment venue owners and operators.
2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
No known alternatives or alternate suggestions.
3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
The consequence of not adopting the code change is inconsistent enforcement due to misinterpretation of the language.
4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.
The Federal ADA, under the 2010 ADA Standards has similar requirements.

***Note: Incomplete forms may be returned to the submitter with instruction to complete the form. Only completed forms can be considered by the TAG.



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Karen Gridley

Date: 4/4/2024

Email address: karen.gridley@state.mn.us

Model Code: IBC

Telephone number: 652-284-5877

Code or Rule Section: 1112 Signage

Firm/Association affiliation, if any: CCLD with minor amendments.

Topic of proposal: Accept model code language

Code or rule section to be changed: MN 1341, Section 1111

Intended for Technical Advisory Group ("TAG"): 1341

General Information

Yes **No**

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

change language contained the model code book? If so, list section(s).

Yes, It will change a portion of the model code Section 1112 with portions of the MN Amendment in 1341 Subp. 9 Section 1111

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

Yes, It will substantially replace MN amendment 1341 Subp.9 Section 1111, while maintaining only a small portion of the MN amendment language.

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

Yes. Some portions of the model code language must be deleted or changed to align with other MN rules.

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

Yes.

add new language that is not found in the model code book or in Minnesota Rule.

Yes. Adds new language not found in MN Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.
No
3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

(Note: blue = Model code. Red strikeout = model code. Purple = MN 1341 existing amendment incorporated within model code.)

Strike out all of MN Rule 1341 Section 1111 and replace with the following model code language, with slight modifications to re-incorporate a few of the MN 1341 amendments that weren't covered by the new model code language.

SECTION 1112

SIGNAGE

1112.1 Signs. Required accessible elements shall be identified by the International Symbol of Accessibility at the following locations.

1. Accessible parking spaces required by Section **1106.2**.
Exception: Where the total number of parking spaces provided is four or less, identification of accessible parking spaces is not required.
2. Accessible parking spaces required by Section **1106.3**
Exception: In Group I-1, R-2, R-3 and R-4 *facilities*, where parking spaces are assigned to specific *dwelling units* or *sleeping units*, identification of accessible parking spaces is not required.
3. Accessible passenger loading zones.
4. Accessible toilet or bathing rooms where not all toilet or bathing rooms are *accessible*.
5. Accessible entrances where not all entrances are accessible.
6. Accessible checkout aisles where not all aisles are accessible. The sign, where provided, shall be above the checkout aisle in the same location as the checkout aisle number or type of checkout identification.
7. Accessible dressing, fitting and locker rooms where not all such rooms are accessible.
8. *Accessible areas of refuge* in accordance with Section **1009.9**.
9. Exterior areas for assisted rescue in accordance with Section **1009.9**.
10. In recreational *facilities*, lockers that are required to be accessible in accordance with Section **1110.12**.

1112.2 Signs identifying toilet rooms, or bathing rooms, locker rooms, dressing rooms or fitting rooms.

Signs ~~required in Section 403.4 of the International Plumbing Code~~ identifying toilet rooms, ~~and~~ bathing rooms, locker rooms, dressing rooms, or fitting rooms, shall be visual characters, raised characters and braille complying with ICC A117.1. Where pictograms are provided as designations ~~for toilet rooms and bathing rooms~~, the pictograms shall have visual characters, raised characters and braille complying with ICC A117.1.

1112.3 Directional signage. Directional signage indicating the route to the nearest like accessible element shall be provided at the following locations. These directional signs shall include the International Symbol of Accessibility and sign characters shall meet the visual character requirements in accordance with ICC A117.1.

1. Inaccessible *building* entrances.
2. Inaccessible public toilets and bathing *facilities*.
3. Elevators not serving an *accessible route*.
4. At each separate-sex toilet and bathing room indicating the location of the nearest family/assisted use toilet or bathing room where provided in accordance with Section **1110.2.1**.

5. At *exits* and *exit stairways* serving a required accessible space, but not providing an *approved accessible means of egress*, signage shall be provided in accordance with **Section 1009.10**.
6. Where drinking fountains for *persons* using wheelchairs and drinking fountains for standing *persons* are not located adjacent to each other, directional signage shall be provided indicating the location of the other drinking fountains.

1112.4 Other signs. Signage indicating special accessibility provisions shall be provided as shown.

1. Each assembly area required to comply with **Section 1109.2.7** shall provide a sign notifying patrons of the availability of assistive listening systems. The sign shall comply with ICC A117.1 requirements for visual characters and include the International Symbol of Access for Hearing Loss.

Exception: Where ticket offices or windows are provided, signs are not required at each assembly area provided that signs are displayed at each ticket office or window informing patrons of the availability of assistive listening systems.

2. At each door to an area of refuge providing direct access to a stairway, exterior area for assisted rescue, exit stairway, exit passageway, or exit discharge, signage shall be provided in accordance with **Section 1013.4**.

3. At *areas of refuge*, signage shall be provided in accordance with **Section 1009.11**.

4. At exterior areas for assisted rescue, signage shall be provided in accordance with **Section 1009.11**.

5. At two-way communication systems, signage shall be provided in accordance with **Section 1009.8.2**.

6. In *interior exit stairways* and *ramps*, floor level signage shall be provided in accordance with **Section 1023.9**.

7. ~~Signs identifying the type of access provided on amusement rides required to be accessible by Section 1111.4.8 shall be provided at entries to queues and waiting lines. In addition,~~ **At amusement rides** where accessible unload areas also serve as accessible load areas, signs indicating the location of the accessible load and unload areas shall be provided at entries to queues and waiting lines. These directional sign characters shall meet the visual character requirements in accordance with ICC A117.1.

8. Where signages is provided with instructions for the operation of exit doors the signage shall comply with ICC A117.1 requirements for visual characters.

1112.5 Variable message signs. Where provided in the locations in **Sections 1112.5.1 and 1112.5.2**, variable message signs shall comply with the variable message sign requirements of ICC A117.1.

1112.5.1 Transportation facilities. Where provided in transportation *facilities*, variable message signs conveying transportation-related information shall comply with **Section 1112.5**.

1112.5.2 Emergency shelters. Where provided in *buildings* that are designated as emergency shelters, variable message signs conveying emergency-related information shall comply with **Section 1112.5**.

Exception: Where equivalent information is provided in an audible manner, variable message signs are not required to comply with ICC A117.1.

1112.6 Designations. Where provided, interior and exterior signs identifying permanent rooms and spaces shall be visual characters, raised characters and braille complying with ICC A117.1. Where pictograms are provided as designations of interior rooms and spaces, the pictograms shall have visual characters, raised characters and braille complying with ICC A117.1.

Exceptions:

1. Exterior signs that are not located at the door to the space they serve are not required to comply.
2. *Building* directories, menus, seat and row designations in assembly areas, occupant names, *building* addresses and company names and logos are not required to comply.
3. Signs in parking *facilities* are not required to comply.
4. Temporary (7 days or less) signs are not required to comply.

5. In detention and correctional *facilities*, signs not located in public areas are not required to comply.

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.

No.

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)

This proposed code change is necessary because the model code language now includes nearly all of what we've had in our MN amendment for the entirety of MN Section 1111. It is no longer necessary to maintain the entire MN amendment because the model code now covers everything but a few items.

2. Why is the proposed code change a reasonable solution?
The proposed change is reasonable in order to harmonize MN 1341 with the model code, the Federal ADA and the original intent of the code.
3. What other factors should the TAG consider?
None.

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
No cost change. The proposed change provides clarification to previously unclear amendment language.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
N/A
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
N/A
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
N/A
5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
N/A

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?

Building owners and operators, designers, and the signage industry.

2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
No known alternatives or alternate suggestions.
3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
The consequence of not adopting the code change is inconsistent enforcement due to misinterpretation of the language.
4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.
The Federal ADA, under the 2010 ADA Standards has similar requirements.

***Note: Incomplete forms may be returned to the submitter with instruction to complete the form. Only completed forms can considered by the TAG.



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: C. Scott Anderson

Date: 4/14/24

Email address: c.scott.anderson@minneapolismn.gov

Model Code: 2024 IBC

Telephone number: 612-246-7303

Code or Rule Section: 1305

Firm/Association affiliation, if any: City of Minneapolis

Topic of proposal: Definition: Restricted entrance

Code or rule section to be changed: IBC Section 202 Definitions

Intended for Technical Advisory Group ("TAG"):

General Information

Yes **No**

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

- change language contained the model code book? If so, list section(s).
- change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
- delete language contained in the model code book? If so, list section(s).
- delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
- add new language that is not found in the model code book or in Minnesota Rule.
202 Definitions: Restricted Entrance

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

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~strikethrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.
RESTRICTED ENTRANCE. An entrance that is made available for common use on a controlled basis, but not public use, and that is not a service entrance. A controlled basis is where entry access is verified by security personnel and entry is limited to authorized occupants and excludes their guests or companions.

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

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)
With the current definition of restricted entrances, there is a misinterpretation that locking a door and requiring a card or key for access makes the entrance a restricted entrance. With the requirement for automatic doors added to the codes for all public entrances, this becoming even more of an issues for hotels and office buildings.
The following is from the guidance for the US Access Board.
Restricted Entrances [§206.4.7] If entrances are restricted to certain occupants on a controlled basis, at least one must comply in addition to public entrances required to be accessible. This applies to those entrances where entry access is verified by security personnel and is strictly limited to certain occupants, but no one else, including guests or companions of authorized individuals. All other types of entrances, excluding service entrances, are considered “public entrances” under the Standards, including employee-only entrances requiring keys or access cards or codes but that lack the level of security of restricted entrances

2. Why is the proposed code change a reasonable solution?
This addition to the definition reduced confusion and clarifies code requirement

3. What other factors should the TAG consider?
None

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
This is an editorial change and should not impact the cost of construction.

2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
No cost change

3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
NA
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
No

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Architects, Contractors, Developers, Building Owners, Contractors, Building Officials
2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
No
3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Not adopting this change will perpetuate the current misinterpretation of the code requirements resulting in structures that are out of compliance with both state accessibility codes and federal regulations.
4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.
This change was adopted by the ICC egress committee at the April 2024 Code Action Hearings by a vote of 14-0 and is unlikely to be overturned at the final action hearings and voting. Regardless of the ICC actions this is a significant improvement to the current code language.

***Note: Incomplete forms may be returned to the submitter with instruction to complete the form. Only completed forms can considered by the TAG.



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Karen Gridley

Date: 4/22/2024

Email address: karen.gridley@state.mn.us

Model Code: IBC

Telephone number: 652-284-5877

Code or Rule Section: 1341

Firm/Association affiliation, if any: CCLD

Topic of proposal: Exterior Clear Width Allowance

Code or rule section to be changed: ANSI 403.5.1

Intended for Technical Advisory Group ("TAG"): 1341

General Information

Yes **No**

- A. Is the proposed change unique to the State of Minnesota?
- B. Is the proposed change required due to climatic conditions of Minnesota?
- C. Will the proposed change encourage more uniform enforcement?
- D. Will the proposed change remedy a problem?
- E. Does the proposal delete a current Minnesota Rule, chapter amendment?
- F. Would this proposed change be appropriate through the ICC code development process?

Proposed Language

1. The proposed code change is meant to:

change language contained the model code book? If so, list section(s).
Yes. It modifies the exceptions in A117.1 Section 403.5.1

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
No

delete language contained in the model code book? If so, list section(s).
No

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
No

add new language that is not found in the model code book or in Minnesota Rule.
Yes

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

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

403.5.1 General.

The clear width of an interior accessible route shall be 36 inches (915 mm) minimum. The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum.

Exceptions:

1. In new buildings and facilities, the clear width of interior and exterior accessible routes shall be permitted to be reduced to 32 inches (815 mm) for a length of 24 inches (610 mm) maximum provided the reduced-width segments are separated by segments that are 52 inches (1320 mm) minimum in length and 36 inches (915 mm) minimum in width.
 2. In existing buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) for a length of 24 inches (610 mm) maximum provided the reduced-width segments are separated by segments that are 48 inches (1320 mm) minimum in length and 36 inches (915 mm) minimum in width.
 3. The clear width of an exterior accessible route located within seating areas shall be 36 inches (915 mm) minimum.
 4. The clear width of an exterior ramp shall comply with Section 405.5
4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.

No.

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)

This proposed code change is necessary to clarify that at accessible parking access aisles designers and contractors are allowed to place a vertical post mounted sign centered at the head of the access aisle, as required by MN Rule 1341 502.4.4, where the accessible route is located at the head of the access aisle and is flush with the access aisle for the full 8-foot width of the access aisle. This helps designers, contractors and code officials understand that the vertical post is not an obstruction to the accessible route where there is a minimum of 32" of clearance on either side of the sign bollard for a mobility device to pass.

It is important to have vertical posted signage at the MN required 8-foot wide access aisle stating "No Parking" instead of just the words painted on the ground because when it snows, even a light dusting of snow covers the words and the space looks like it is an available parking space. If a vehicle is parked in the access aisle it will obstruct access in and out of the adjacent vehicles used by persons with disabilities. This makes the vertical sign critical. The only exception is where the accessible route at the head of the access aisle would be blocked by the sign, such as where the route is a curb ramp that is only 3' – 4' wide.

2. Why is the proposed code change a reasonable solution?

This is reasonable because the minimum clear width allowed for the accessible route at fixed door frames is 32". If a person using a mobility device is able, and expected to be able, to pass through a fixed door frame that is 32" wide, they should be able to just as easily pass between other objects with the same clear passing width regardless of whether it is interior or exterior.

3. What other factors should the TAG consider?

This is unique to Minnesota due to the 1341 requirement to provide vertical signs and 8-foot wide access aisles.

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
No cost change.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
N/A
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
N/A
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
N/A
5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
N/A

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Designers, contractors, code professionals.
2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
No known alternatives or alternate suggestions.
3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Probable consequences of not adopting the code change include code officials and inspectors not allowing the post sign to be provided at the head of access aisles and

drivers parking in access aisles due to the lack of signage identifying it as a no parking space.

4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.

None.

***Note: Incomplete forms may be returned to the submitter with instruction to complete the form. Only completed forms can considered by the TAG.



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Haidee Tan

Date: 4/28/2024

Email address: htan@dlrgroup.com

Model Code: 2024 IBC

Telephone number: 612-977-3555

Code or Rule Section: IBC 1105.1.1

Firm/Association affiliation, if any: Architect

Topic of proposal: Power-operated doors

Code or rule section to be changed: IBC 1105.1.1

Intended for Technical Advisory Group ("TAG"):

General Information

Yes **No**

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

change language contained the model code book? If so, list section(s).
Yes, it will clarify a section of the model code Section 1105.1.1

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
No

delete language contained in the model code book? If so, list section(s).
No

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
No

add new language that is not found in the model code book or in Minnesota Rule.
Yes

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

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

1105.1.1 Power-operated doors at public building entrances. In facilities with the occupancies and building *occupant loads greater than* indicated in Table 1105.1.1, each *public building entrance* required to be *accessible* shall have a minimum of one door be a *power-operated* door or a *low-energy power-operated door*. Where the accessible *public building entrance* includes doors in series, such as a vestibule, a minimum of one set of two doors in series shall meet the requirements of this section.

TABLE 1105.1.1 –PUBLIC BUILDING ENTRANCE WITH POWER-OPERATED DOOR

OCCUPANCY	BUILDING OCCUPANT LOAD GREATER THAN
A-1, A-2, A-3, A-4	300
B, M, R-1	500

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.

No

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)

Section 202 Definitions defines “PUBLIC ENTRANCE. An entrance that is not a service entrance or a restricted entrance.”

Although the intent of power operated doors of 1501.1.1 applies only to exterior public entrance and vestibule doors because it follows 1105 ACCESSIBLE ENTRANCES section, it is unclear if the provision also includes interior doors because the definition of “public entrance” does not distinguish the location of public doors. If “building” is not added to section 1105.1.1, it can be interpreted that all doors to public spaces, including interior public spaces/rooms, and not just the building entrances of Group A, B, M or R, would require power-operators if it exceeded Table 1105.1.1 occupant loads. Adding the additional description “building” further clarifies which public entrances.

2. Why is the proposed code change a reasonable solution?

To clarify that power-operated doors requirements are limited to exterior doors and vestibules of Group A, B, M, R occupancies.

3. What other factors should the TAG consider?

Public Exterior Building Entrances was considered; however, power-operated features are required at interior vestibule doors when in sequence, and adding “Exterior”, might imply power-operators are not required at interior vestibule doors.

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.

There is no change in cost. The code change clarifies the intent. It does not increase or decrease the extent of the code requirement.

2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.

N/A

3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.

N/A

4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.

N/A

5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.

N/A

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?

Owners and developers of high occupant load facilities similar to arenas, hotels, banquet halls, retail, performance venues, auditoriums.

2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.

No other means to achieve the same purpose. No alternatives.

3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?

Although door operators are a convenient feature, it's an added cost if not required. The consequence of not adopting is the possibility of building officials or design team adding door operators where unnecessary.

4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.

Not aware of any federal or state regulation or requirement

***Note: The information you provide in this code change proposal form is considered Public Data and used by the TAG to consider your proposed modification to the code. Any code change proposal form submitted to DLI may be reviewed at public TAG meetings and used by department staff and the Office of Administrative Hearings to justify the need and reasonableness of any proposed rule draft subject to administrative review and is available to the public.

****Note: Incomplete forms will be returned to the submitter with instructions to complete the form. Only completed forms will be accepted and considered by the TAG. The submitter may be asked to provide additional information in support of the proposed code change.