



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Karen Gridley

Date: 7/10/2024

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

Model Code: IEBC

Telephone number: 652-284-5877

Code or Rule Section: 306.5 & MN 1341

Firm/Association affiliation, if any: CCLD

Topic of proposal: Accessibility for Change of Occupancy.

Code or rule section to be changed: 2024 IEBC 306.5 and MR 1341.0030 Subp. 2 Section305.4.2

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 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).

IEBC 306.5

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

MR 1341.0030 Subp. 2 Section305.4.2

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). **MR 1341.0030 Subp. 2 Section305.4.2**

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

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.
The proposed change is to align with MN requirements for accessibility in licensed assisted living facilities, including when a single-family home is changed to an R-3 occupancy licensed care facility, to ensure the specific accessibility elements listed in the subitems are provided for these facilities. It will also ensure a level of accessibility for other existing buildings undergoing a change of occupancy.
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.

306.5 Change of occupancy. Where an existing building undergoes a change of occupancy that includes alterations, such alterations shall comply with Section 306.7. Where an existing building undergoes a change of occupancy that does not include alterations, accessibility shall be provided as indicated in items 1 through 6.

1. Not fewer than one accessible building entrance.
2. Not fewer than one accessible route from an accessible building entrance to primary function areas.
- ~~3. Signage complying with IBC Section 1111.~~
4. 3. Accessible parking, where parking is being provided.
- ~~5.~~ 4. Not fewer than one accessible passenger loading zone, where loading zones are provided.
- ~~6.~~ 5. Not fewer than one accessible route connecting accessible parking and accessible passenger loading zones to an accessible entrance.
- ~~7.~~ 6. Not fewer than one accessible family or assisted-use toilet room or bathing room, or one accessible male and one accessible female toilet room or bathing room, shall be located on an accessible route not more than one story above or one story below a floor without such facilities. At the inaccessible toilet and bathing rooms, directional signs indicating the location of the nearest family or assisted-use toilet room or bathing room shall be provided. 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.

Where it is technically infeasible for items 1 through 7 to comply with the new construction standards for a change of ~~group or~~ occupancy, items 1 to 7 shall conform to the requirements to the maximum extent technically feasible.

Exception: The accessible features listed in items 1 to ~~7~~ 6 are not required for an accessible route to Type B units.

(**note:** Black text = new model code language. Blue = proposed new 1341 language. Purple = existing/changed 1341 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.)

To align with MN requirements for accessibility in licensed assisted living facilities, including when a single-family home is changed to an R-3 occupancy licensed care facility, to ensure the specific accessibility elements listed in the subitems are provided for Accessible units required in these facilities. It will also ensure a level of accessibility for other existing buildings undergoing a change of occupancy such as group A, B or M occupancies.

2. Why is the proposed code change a reasonable solution?
The proposed change is reasonable in order to maintain current requirements for buildings undergoing a complete change of occupancy.
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 carries forward existing requirements.
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, architects, designers, code officials and inspectors.
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?
The consequence of not adopting the code change is lack of accessibility in buildings that currently are required to provide a certain level of access when a change of occupancy occurs, even without an alteration planned.
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.
Other Conservation Code sections require certain upgrades be made to facilities undergoing a change of occupancy, even without a planned alteration. So it is reasonable for accessibility upgrades to also be required.

***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: 7/11/24

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

Model Code: A117.1-2017

Telephone number: 612-284-5877

Code or Rule Section: 1341 multiiple sections

Firm/Association affiliation, if any: CCLD

Topic of proposal: Existing building allowances related to new turning space and clear floor space sizes

Code or rule section to be changed: A117.1

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

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"/> |
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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.
Section 107 Defined terms

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.

DEFINITION CHANGES:

ICC A117.1 Section 107 Definitions.

existing building: (for application to Mn Accessibility code only) A building erected prior to the date of adoption of ~~this standard~~ the 2026 Minnesota Building Code, or one for which a legal building permit has been issued prior to the date of adoption of the 2026 Minnesota Building Code.

existing facility: (for application to Mn Accessibility code only) A facility completed prior to the date of adoption of ~~this standard~~ the 2026 Minnesota Building Code, or one for which a legal building permit has been issued prior to the date of adoption of the 2026 Minnesota Building Code.

AND / OR:

CODE SECTION CHANGES:

304.3.1.2 Existing buildings and facilities.

In **existing** buildings and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, the turning space shall be a circular space with a 60-inch (1525 mm) minimum diameter.

304.3.2.2 Existing buildings and facilities.

In **existing** buildings and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, the turning space shall be a T-shaped space within a 60-inch (1525 mm) minimum square, with arms and base 36 inches (915 mm) minimum in width. Each arm of the T shall be clear of obstructions 12 inches (305 mm) minimum in each direction, and the base shall be clear of obstructions 24 inches (610 mm) minimum.

305.3.2 Existing buildings and facilities.

In **existing** buildings and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, the clear floor space shall be 48 inches (1220 mm) minimum in length and 30 inches (760 mm) minimum in width.

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 shall be permitted to be reduced to 32 inches (815 mm) minimum 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 erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.

403.5.2.2 Existing buildings and facilities.

In **existing** buildings and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, where an accessible route makes a 180 degree turn around an object that is less than 48 inches (1220 mm) in width, clear widths shall be 42 inches (1065 mm) minimum approaching the turn, 48 inches (1220 mm) minimum during the turn, and 42 inches (1065 mm) minimum leaving the turn.

Exception: This section shall not apply where the clear width during the turn is 60 inches (1525 mm) minimum.

403.5.3.2 Existing buildings and facilities.

In **existing** buildings and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, where an accessible route makes a 90-degree turn the clear widths approaching the turn and leaving the turn shall be 36 inches (915 mm) minimum.

403.5.4.2 Existing buildings and facilities.

In **existing** buildings and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, an accessible route with a clear width less than 60 inches (1525 mm) shall provide passing spaces at intervals of 200 feet (61 m) maximum. Passing spaces shall be either a 60-inch (1525 mm) minimum by 60-inch (1525 mm) minimum space, or an intersection of two walking surfaces that provide a T-shaped turning space complying with Section 304.3.2, provided the base and arms of the T-shaped space extend 48 inches (1220 mm) minimum beyond the intersection.

404.2.3.2 Swinging doors and gates.

Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.3.2.

**TABLE 404.2.3.2
—MANEUVERING CLEARANCES AT MANUAL SWINGING DOORS AND GATES**

TYPE OF USE		MINIMUM MANEUVERING CLEARANCES	
Approach Direction	Door or Gate Side	Perpendicular to Doorway	Parallel to Doorway (beyond latch unless noted)
From front	Pull	60 inches (1525 mm)	18 inches (455 mm)
From front	Push	52 inches (1320 mm) ⁵	0 inches (0 mm) ³
From hinge side	Pull	60 inches (1525 mm)	36 inches (915 mm)
From hinge side	Pull	54 inches (1370 mm)	42 inches (1065 mm)
From hinge side	Push	42 inches (1065 mm) ¹	22 inches (560 mm) ⁴

From latch side	Pull	48 inches (1220 mm) ²	24 inches (610 mm)
From latch side	Push	42 inches (1065 mm) ²	24 inches (610 mm)

1. ¹Add 6 inches (150 mm) if closer and latch provided.
2. ²Add 6 inches (150 mm) if closer provided.
3. ³Add 12 inches (305 mm) beyond latch if closer and latch provided.
4. ⁴Beyond hinge side.
5. ⁵In existing buildings and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, the dimension perpendicular to the door or gate for the front direction on the push side shall be 48 inches (1220 mm) minimum.

TABLE 404.2.3.4
—MANEUVERING CLEARANCES FOR DOORWAYS WITHOUT DOORS OR GATES

Approach Direction	MINIMUM MANEUVERING CLEARANCES Perpendicular to Doorway
From front	52 inches (1320 mm) ¹
From side	42 inches (1065 mm)

1. In existing buildings and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code the dimension perpendicular to the doorway for the front direction shall be 48 inches (1220 mm) minimum.

409.4.1.2 Existing buildings.

In existing buildings erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, elevator cars shall provide a clear floor area 36 inches (915 mm) minimum in width and 48 inches (1220 mm) minimum in depth.

410.5.1.2 Existing buildings.

In existing buildings erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, platform lifts with a single door or with doors on opposite ends shall provide a clear floor width of 36 inches (915 mm) minimum and a clear floor depth of 48 inches (1220 mm) minimum.

410.5.2.2 Existing buildings.

In existing buildings erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, platform lifts with doors on adjacent sides shall be permitted to provide a clear floor width of 36 inches (915 mm) and a clear floor depth of 60 inches (1525 mm).

503.3.2.2 Existing buildings and facilities.

In existing buildings and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, access aisles serving vehicle pull-up spaces shall be 60 inches (1525 mm) minimum in width.

608.2.1.2.2 Existing buildings and facilities.

In existing buildings and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, a clearance of 48 inches (1220 mm) minimum in length measured perpendicular from the

control wall, and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment.

802.4.2 Existing buildings and facilities.

In **existing** buildings and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, where a wheelchair space is entered from the front or rear, the wheelchair space shall be 48 inches (1220 mm) minimum in depth. Where a wheelchair space is only entered from the side, the wheelchair space shall be 60 inches (1525 mm) minimum in depth.

805.2.2.2 Existing buildings and facilities.

In **existing** buildings and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, bus stop boarding and alighting areas shall have a 96-inch (2440 mm) minimum clear length, measured perpendicular to the curb or vehicle roadway edge, and a 60-inch (1525 mm) minimum clear width, measured parallel to the vehicle roadway.

1007.3.2.2 Existing buildings and facilities.

In **existing** building and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, areas within holes where golf balls rest shall be within 36 inches (915 mm) maximum of a clear floor space 36 inches (915 mm) minimum in width and 48 inches (1220 mm) minimum in length having a running slope not steeper than 1:20. The clear floor space shall be served by an accessible route.

1009.2.3.2 Existing buildings and facilities.

In **existing** buildings and facilities erected or completed prior to the date of adoption of the 2026 Minnesota Building Code, on the side of the seat opposite the water, a clear deck space shall be provided parallel with the seat. The space shall be 36 inches (915 mm) minimum in width and shall extend forward 48 inches (1220 mm) minimum from a line located 12 inches (305 mm) behind the rear edge of the seat. The clear deck space shall have a slope not steeper than 1:48.

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.

If the definition of existing buildings and existing facilities is modified in the A117.1 Standard, it may need to be addressed in the same definitions in the Minnesota Building Code and other state codes. Would need to coordinate with the other TAGs to determine impact, if any.

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 clarifies that the existing building provisions noted in A117.1-2017 only apply to buildings designed and constructed prior to the adoption of this standard.

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

This addition to the definition reduces confusion and clarifies code requirements. It also closes 2 perceived loopholes: One where contractors continually pull new permits so a structure can continue to be considered an existing building or facility. The other where contractors/designers build a shell of a building so that it is considered existing, and any subsequent new build outs of

interior spaces are now within an existing building that can use the exception to the larger turning space and clear floor space sizes. This may not be an issue when you consider that the MN Conservation Code can not be used to build out the shell of an existing building; the Minnesota Building Code for new construction must be used to build out tenant spaces within building shells so all work within the shell is considered new construction and must comply with new construction criteria. Even if the Conservation Code could be used for the build out of a building shell, IEBC Accessibility Scoping Section 306.7 for alterations also requires any alteration work to existing buildings to comply with the provisions for new construction, unless technically infeasible.

However, by adding a date that clearly marks a specific point in time that buildings are considered existing for the purpose of the turning space and clear floor space size exemptions makes it abundantly clear which buildings can and cannot utilize the exemptions and can contribute to more uniform enforcement.

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, 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 create some confusion regarding when the existing building allowances may be applied.

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.

no

***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: C. Scott Anderson

Date: 5/29/24

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

Model Code: 2024 IBC / A117.1-2017

Telephone number: 612-246-7303

Code or Rule Section: 1341

Firm/Association affiliation, if any: City of Minneapolis

Topic of proposal: Section 107.5 Defined Terms

Code or rule section to be changed: 1341

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"/> |
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| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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| 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).
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- delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
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Section 107 Defined terms

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.

existing building: (for application to Mn Accessibility code only) ~~A building erected prior to the date of adoption of this standard, or one for which a legal building permit has been issued.~~ or for which a valid permit was issued before June 1, 2026.

existing facility: (for application to Mn Accessibility code only) ~~A facility completed prior to the date of adoption of this standard, or one for which a legal permit has been issued.~~ or for which a valid permit was issued before June 1, 2026.

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 clarifies that the existing building provisions noted in A117.1-2017 only apply to buildings designed and constructed prior to the adoption of this standard.

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 create some confusion regarding when the existing building allowances may be applied
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.
- no

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