



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: C. Scott Anderson

Date: 7/10/24 Revision 09/16/24

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Model Code: 2024 IBC

Telephone number: 612-246-7303

Code or Rule Section: 202, 1210.3, 2902.1, 2901.2 MAC 1109.2 + 1109.2.2

Firm/Association affiliation, if any: City of Minneapolis

Topic of proposal: 202, 1210.3, 2902.1, 2901.2 MAC 1109.2 + 1109.2.2

Code or rule section to be changed: 202, 1210.3, 2902.1, 2901.2 MAC 1109.2 + 1109.2.2

Intended for Technical Advisory Group ("TAG"):

| <u>General Information</u> | <u>Yes</u> | <u>No</u> |
|--|-------------------------------------|-------------------------------------|
| 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, 1210.3, 2902.1, 2901.2, Table 2902.1 MAC 1109.2 + 1109.2.2

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.

202 Definitions

Toilet Facility – A room or space that contains not less than one water closet and one lavatory.

1210.3 Privacy

~~Public restrooms~~ Toilet and bathing facilities shall be visually screened from outside entry or exit doorways to ensure facility user privacy ~~within the restroom~~. This provision shall also apply ~~where~~ to mirrors where their location would compromise ~~personal~~ facility user privacy. Privacy at water closets and urinals shall be provided in accordance with Sections 1210.3.1 ~~and~~ 1210.3.2, 1210.3.3 and 1210.3.4. Bathing facilities shall be provided with privacy in accordance with Section 1210.4.

Exception: Visual screening shall not be required for single-occupant toilet rooms with a lockable door.

[P] 1210.3.1 Water closet compartment in multi-user toilet facilities separated by sex.

Each water closet ~~utilized by the public or employees~~ shall occupy a separate compartment with walls or partitions and a door enclosing the fixtures to ensure privacy. The bottom edge of the partition and door shall be located not more than 16 inches (406 mm) above the finished floor. The top edge of the partition and door shall be located not less than 69 inches (1726 mm) above the finished floor. Gaps shall not be greater than of ½ inch (13 mm) between the edge of the door and the partition. Doors shall be capable of being secured from within the compartment.

Exceptions:

1. Water closet compartments shall not be required in a single-user, family or assisted-use toilet room with a lockable door.
2. Toilet rooms located in child day care facilities and containing two or more water closets shall be permitted to have one water closet without an enclosing compartment.
3. This provision is not applicable to toilet areas located within Group I-3 occupancy housing areas.

1210.3.2 Water closet compartment in multi-user toilet facilities not separated by sex in other than E occupancies.

Each water closet shall occupy a separate compartment with walls and a door to ensure privacy meeting all of the following:

1. Compartment walls shall extend from the floor to the ceiling.
2. Doors shall be lockable from the inside of the compartment. Lock shall be capable of being unlocked from the outside of the compartment by use of a key or other special device. Locking device shall be readily distinguishable as locked from both sides of the door.
3. Doors shall not be undercut by more than ½"
4. At least one compartment shall include a lavatory

Exceptions:

1. Water closet compartments shall not be required in a single-user, family or assisted-use toilet room with a lockable door.
2. Toilet rooms located in child day care facilities and containing two or more water closets shall be permitted to have one water closet without an enclosing compartment.
3. This provision is not applicable to toilet areas located within Group I-3 occupancy housing areas.

1210.3.3 Water closet compartment in multi-user toilet facilities not separated by sex in E occupancies.

Each water closet shall occupy a separate compartment with walls and a door to ensure privacy meeting all of the following:

1. Compartment doors shall be observable from primary circulation areas or other normally occupied spaces.
2. Compartment walls shall extend from the floor to the ceiling.
3. Doors shall be lockable from the inside of the compartment. Lock shall be capable of being unlocked from the outside of the enclosure by use of a key or other special device. Locking device shall be readily distinguishable as locked from both sides of the door.
4. Doors shall not be undercut by more than ½"
5. Doors shall swing out of the compartment and be equipped with a hold open device that maintains an angle of not less than 10 degrees.
EXCEPTION: Doors to accessible compartments shall comply with Minnesota Accessibility Code.
6. Doors shall not latch when unlocked.
7. There shall be no less than two means of egress from each toilet facility. Doors are not permitted between the toilet facility and any adjacent circulation or other normally occupied space.
8. Not less than 50% of the water closet compartments shall include a lavatory.

[P] 1210.3.4 Urinal partitions.

Each urinal ~~utilized by the public or employees~~ shall occupy a separate area with walls or partitions to provide user privacy. The walls or partitions shall begin at a height not more than ~~12~~ 16 inches (~~305~~ 406 mm) from and extend not less than 60 inches (1524 mm) above the finished floor surface. The walls or partitions shall extend from the wall surface at each side of the urinal not less than 18 inches (457 mm) or to a point not less than 6 inches (152 mm) beyond the outermost front lip of the urinal measured from the finished backwall surface, whichever is greater.

Exceptions:

1. Urinal partitions shall not be required in a single-occupant or family or assisted-use toilet room with a lockable door.
2. Toilet rooms located in child day care *facilities* and containing two or more urinals shall be permitted to have one urinal without partitions.
3. Urinals are not permitted in multi-user toilet facilities not separated by sex.

1210.4 Bathing facilities NOT separated by sex.

Each bathing facility shall occupy a separate compartment with walls and a door enclosing the fixtures to ensure privacy meeting all of the following:

1. Walls shall extend from the floor to the ceiling.

2. Doors shall be lockable from the inside of the compartment. Lock shall be capable of being unlocked from the outside of the compartment by use of a key or other special device. Locking device shall be readily distinguishable as locked from both sides of the door.
3. Doors shall not be undercut by more than ½"
4. Each compartment shall be provided with a changing area separated from the bathing area to prevent wetting of the changing area during the bathing activities.

Exceptions:

1. I-3 occupancies

[P] 2902.1.3 Lavatory distribution.

Where two or more toilet facilities are provided for each sex, the required number of lavatories shall be distributed proportionately to the required number of male- and female-designated water closets. Where toilet facilities are not separated by sex, lavatories shall be located in the same room or space as the water closet compartments.

[P] 2902.2 Separate facilities.

Where plumbing fixtures are required, separate *facilities* shall be provided for each sex.

Exceptions:

1. Separate toilet *facilities* shall not be required for *dwelling units* and *sleeping units*.
2. Separate toilet *facilities* shall not be required in *structures* or tenant spaces with a total *occupant load*, including both employees and customers, of ~~15- 25~~ or fewer.
3. Separate toilet *facilities* shall not be required in mercantile occupancies in which the maximum *occupant load* is 100 or fewer.
4. ~~Separate toilet *facilities* shall not be required in business occupancies in which the maximum *occupant load* is 25 or fewer.~~
5. Separate toilet *facilities* shall not be required to be designated by sex where single-user toilet rooms are provided in accordance with Section 2902.1.2.
6. In other than E occupancies, Separate toilet *facilities* shall not be required where rooms having both water closets and lavatory fixtures are designed for use by all *persons* regardless of sex and privacy is provided for water closets in accordance with Section 1210.3.2 .405.3.4 of the *International Plumbing Code* and for urinals in accordance with Section 405.3.5 of the *International Plumbing Code*.
7. In E occupancies, Separate toilet *facilities* shall not be required where rooms having both water closets and lavatory fixtures are designed for use by all *persons* regardless of sex and privacy is provided for water closets in accordance with Section 1210.3.3.
8. Separate bathing facilities shall not be required for rooms having bathing fixtures designed for use by both sexes and privacy installed in accordance with Section 1210.4.

Table 2902.1 MINIMUM NUMBER OF REQUIRED PLUMBING FIXTURES (footnote)

- K. In each ~~bathroom~~ bathing or toilet room facility, urinals shall not be substituted for more than 67 percent of the required water closets. Urinals are not permitted where multi-user toilet facilities are not separated by sex,

Minnesota Accessibility Code modifications

1110.2.4 Water closet compartment in toilet facilities separated by sex

Where water closet compartments are provided in a toilet room or bathing room, at least 5 percent of the total number of compartments shall be wheelchair-*accessible* compartments. Where two or more water closet compartments are provided in a toilet room or bathing room, at least 5 percent of the total number of compartments shall be ambulatory-*accessible* water closet compartments in addition to the wheelchair-*accessible* compartments.

1110.2.5 Water closet compartment in toilet facilities not separated by sex

Where water closet compartments are provided in a toilet room or bathing room, at least 20 percent of the total number of compartments but not less than two shall be wheelchair-*accessible* compartments. Where 3 or more water closet compartments are provided in a toilet room or bathing room, an ambulatory-*accessible* water closet compartment in addition to the wheelchair-*accessible* compartments shall be provided. Where 4 or more water closet compartments are provided in a toilet room or bathing room at least 20 percent of the total number of compartments but not less than two shall be ambulatory-*accessible* water closet compartments in addition to the wheelchair-*accessible* compartments.

1110.2.5.6 Lavatories

Where lavatories are provided, at least 5 percent, but not less than one provided in accessible spaces, shall be accessible. Where an accessible lavatory is located within the accessible water closet compartment at least one additional accessible lavatory shall be provided in the multicompartment toilet room outside the water closet compartment. Where the total lavatories provided in a toilet room or bathing *facility* is six or more, at least one lavatory with enhanced reach ranges shall be provided.

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.)
Toilet and bathing facilities not separated by sex is a design option that is often requested. The model codes have taken some steps to incorporate this into the code. The privacy provisions in the current and proposed codes are not adequate and do not address the specific issues related to school facilities.
2. Why is the proposed code change a reasonable solution?
Currently any option to not separate facilities by sex requires an alternate design approved by the AHJ. Thus each design is subject to the interpretation of the Building Official in each jurisdiction. Adopting these rules will provide direction and clarity. Since alternative compliance decisions by the AHJ are not appealable, this will provide some confidence that designs that meet these requirements will be approved.

3. What other factors should the TAG consider?

There are a number of uses, primarily in assembly functions where the quantity of required fixtures per occupant for male and female are not equal. How to address this difference when using non-separated toilet facilities is not addressed in the model code nor in this code change proposal. This may lead to some confusion or disparity in how these provisions are applied. Accessible signage requirements are also an issue as there is currently no direction as to how to provide signage for identifying ambulatory accessible toilet compartments nor any specific requirement to provide signage at a wheelchair accessible compartment.

Cost/Benefit Analysis

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

The decision to provide toilet facilities not separated by sex is a design decision. While some of the individual requirements listed for designing this option may be more expensive, they should generally be offset by the reduction in requirements for providing separate rooms.

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.

The current process of alternate compliance is the only other option available.

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 result in inconsistency in code enforcement. Since non sex separated toilet facilities are only allowed via the alternate compliance path, each individual project is subject to review and the unique opinion of the building official in each jurisdiction. A design may be approved in Minneapolis but not in St. Paul. Alternative compliance designs are not subject to the code appeals process.

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: Heidi Neumueller

Date: 9/7/2024

Email address: hneu Mueller@cuningham.com

Model Code: 2024 IBC

Telephone number: 612-669-8679

Code or Rule Section: 202, 1210.3,
2902.1, 2901.2, 1110.2

Firm/Association affiliation, if any:

In partnership with of St. Paul Public Schools, JLG Architects,
DSGW Architects, LSE Architects

Topic of proposal: 202, 1210.3, 2902.1,
2901.2, 1110.2

Code or rule section to be changed: 202, 1210.3, 2902.1, 2901.2, 1110.2

Intended for Technical Advisory Group ("TAG"):

General Information

Yes **No**

- | | | |
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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).
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- 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.

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.

202 Definitions

Toilet Facility – A room or space that contains not less than one water closet and one lavatory.

1110.2 Toilet and bathing facilities.

Each toilet room and bathing room shall be accessible. Where a floor level is not required to be connected by an accessible route, the only toilet rooms or bathing rooms provided within the facility shall not be located on the inaccessible floor. Except as provided for in Sections 1110.2.4 and 1110.2.5, at least one of each type of fixture, element, control or dispenser in each accessible toilet room and bathing room shall be accessible.

Exceptions:

1. Toilet rooms or bathing rooms accessed only through a private office, not for common or public use and intended for use by a single occupant, shall be permitted to comply with the specific exceptions in ICC A117.1.
2. This section is not applicable to toilet and bathing rooms located within dwelling units or sleeping units that are not required to be accessible by Section 1108.
3. Excluding multi-user toilet facilities NOT separated by sex in E, where multiple single-user toilet rooms or bathing rooms are clustered at a single location, at least 50 percent but not less than one room for each use at each cluster shall be accessible.
4. Where multi-user toilet facilities NOT separated by sex in E are clustered at a single location, no fewer than two rooms for each use at each cluster shall be accessible.
5. Where no more than one urinal is provided in a toilet room or bathing room, the urinal is not required to be accessible.
6. Toilet rooms or bathing rooms that are part of critical care or intensive care patient sleeping rooms serving Accessible units are not required to be accessible.
7. Toilet rooms or bathing rooms designed for bariatrics patients are not required to comply with the toilet room and bathing room requirement in ICC A117.1. The sleeping units served by bariatrics toilet or bathing rooms shall not count toward the required number of Accessible sleeping units.
8. Where permitted in Section 1108, in toilet rooms or bathrooms serving Accessible units, water closets designed for assisted toileting shall comply with Section 1110.2.2.
9. Where permitted in Section 1108, in bathrooms serving Accessible units, showers designed for assisted bathing shall comply with Section 1110.2.3.
10. Where toilet facilities are primarily for children's use, required accessible water closets, toilet compartments, and lavatories shall be permitted to comply with children's provision of ICC A117.1.

1210.3 Privacy

~~Public restrooms~~ Toilet and bathing Facilities shall be visually screened from outside entry or exit doorways to ensure user privacy within the ~~restroom~~ facility. This provision shall also apply where mirrors would compromise personal privacy. Privacy at water closets and urinals shall be provided in accordance with Sections 1210.3.1 ~~and~~ , 1210.3.2, 1210.3.3 and 1210.3.4. Bathing facilities shall be provided with privacy in accordance with Section 1210.4.

~~Exception: Visual screening shall not be required for single-occupant toilet rooms with a lockable door.~~

[P] 1210.3.1 Water closet compartment in multi-user toilet facilities separated by sex.

~~Each water closet utilized by the public or employees shall occupy a separate compartment with walls or partitions and a door enclosing the fixtures to ensure privacy. The bottom edge of the partition including the door shall be located not more than 16 inches (406 mm) above the finished floor. The top edge of the partition including the door shall be located not less than 69 inches (1726 mm) above the finished floor. The door to the partitions shall have a maximum of ½ inch (13 mm) gap between the edge of the door and the wall of the partition. Doors shall be lockable from the inside of the partition enclosure.~~

Exceptions:

- ~~1. Water closet compartments shall not be required in a single-user, family or assisted-use toilet room with a lockable door.~~
- ~~2. Toilet rooms located in child day care facilities and containing two or more water closets shall be permitted to have one water closet without an enclosing compartment.~~
- ~~3. This provision is not applicable to toilet areas located within Group I-3 occupancy housing areas.~~

[P] 1210.3.2 Water closet compartment in multi-user toilet facilities NOT separated by sex.

~~Each water closet shall occupy a separate compartment with walls and a door enclosing the fixtures to ensure privacy meeting all of the following:~~

- ~~1. Walls shall extend from the floor to the ceiling.~~
- ~~2. Doors shall be lockable from the inside of the enclosure. Lock shall be capable of being unlocked from the outside of the enclosure by use of a key or other special device. Locking device shall be readily distinguishable as locked.~~
- ~~3. Each compartment shall be provided with exhaust~~
- ~~4. Doors shall not be undercut by more than ½"~~
- ~~5. Each compartment shall be provided with a floor drain.~~

Exceptions:

- ~~1. Water closet compartments shall not be required in a single-user, family or assisted-use toilet room with a lockable door.~~
- ~~2. Toilet rooms located in child day care facilities and containing two or more water closets shall be permitted to have one water closet without an enclosing compartment.~~
- ~~3. This provision is not applicable to toilet areas located within Group I-3 occupancy housing areas.~~

[P] 1210.3.3 Water closet compartment in multi-user toilet facilities NOT separated by sex in E occupancies.

~~Each water closet shall occupy a separate compartment with walls and a door enclosing the fixtures to ensure privacy meeting all of the following:~~

- ~~1. Compartment doors shall be observable from primary circulation areas or other normally occupied spaces.~~
- ~~2. Walls shall extend from the floor to the ceiling.~~

3. Doors shall be lockable from the inside of the enclosure. Lock shall be capable of being unlocked from the outside of the enclosure by use of a key or other special device. Locking device shall be readily distinguishable as locked.
4. Each compartment shall be provided with exhaust
5. Doors shall not be undercut by more than ½"
6. Door Shall have no gap that exceeds ½"
7. Doors shall swing out of the compartment and be equipped with a hold open device that maintains a min 15 degree open angle.
8. Doors shall not latch when unlocked.
9. Each compartment shall be provided with a floor drain.
10. There shall be no less than two means of egress from each toilet facility. Doors are not permitted between the toilet facility and any adjacent circulation or other normally occupied space.

[P] 1210.3.4 Urinal partitions.

Each urinal utilized by the public or employees shall occupy a separate area with walls or partitions to provide privacy. The walls or partitions shall begin at a height not more than ~~12~~ 16 inches (~~305~~ 406 mm) from and extend not less than 60 inches (1524 mm) above the finished floor surface. The walls or partitions shall extend from the wall surface at each side of the urinal not less than 18 inches (457 mm) or to a point not less than 6 inches (152 mm) beyond the outermost front lip of the urinal measured from the finished backwall surface, whichever is greater.

Exceptions:

1. Urinal partitions shall not be required in a single-occupant or family or assisted-use toilet room with a lockable door.
2. Toilet rooms located in child day care *facilities* and containing two or more urinals shall be permitted to have one urinal without partitions.
3. Urinals are not permitted in multi-user toilet facilities not separated by sex.

1210.4 Bathing facilities NOT separated by sex.

Each bathing facility shall occupy a separate compartment with walls and a door enclosing the fixtures to ensure privacy meeting all of the following:

1. Walls shall extend from the floor to the ceiling.
2. Doors shall be lockable from the inside of the enclosure. Lock shall be capable of being unlocked from the outside of the enclosure by use of a key or other special device. Locking device shall be readily distinguishable as locked.
3. Each compartment shall be provided with exhaust
4. Doors shall not be undercut by more than ½"
5. Each compartment shall be provided with a changing area separated from the bathing area to prevent wetting of the changing area during the bathing activities.

Exceptions:

1. 1-3 occupancies

[P] 2902.1.3 Lavatory distribution.

Where two or more toilet facilities are provided for each sex, the required number of lavatories shall be distributed proportionately to the required number of male- and female-designated water closets. Where toilet facilities are not separated by sex, lavatories shall be located in the same room or space as the water closet compartments.

[P] 2902.2 Separate facilities.

Where plumbing fixtures are required, separate *facilities* shall be provided for each sex.

Exceptions:

1. Separate toilet *facilities* shall not be required for *dwelling units* and *sleeping units*.
2. Separate toilet *facilities* shall not be required in *structures* or tenant spaces with a total *occupant load*, including both employees and customers, of ~~15- 25~~ or fewer.
3. Separate toilet *facilities* shall not be required in mercantile occupancies in which the maximum *occupant load* is 100 or fewer.
4. ~~Separate toilet *facilities* shall not be required in business occupancies in which the maximum *occupant load* is 25 or fewer.~~
5. Separate toilet *facilities* shall not be required to be designated by sex where single-user toilet rooms are provided in accordance with Section 2902.1.2.
6. In other than E occupancies, Separate toilet *facilities* shall not be required where rooms having both water closets and lavatory fixtures are designed for use by all *persons* regardless of sex and privacy is provided for water closets in accordance with Section 1210.3.2 or 1210.3.3. ~~405.3.4 of the *International Plumbing Code* and for urinals in accordance with Section 405.3.5 of the *International Plumbing Code*.~~
7. In E occupancies, Separate toilet *facilities* shall not be required where rooms having both water closets and lavatory fixtures are designed for use by all *persons* regardless of sex and privacy is provided for water closets in accordance with Section 1210.3.4. When using this exception not less than two shall be provided in single-user, family or assisted-use toilet rooms.
8. Separate bathing facilities shall not be required for rooms having bathing fixtures designed for use by both sexes and privacy installed in accordance with Section 1210.4.

Table 2902.1 MINIMUM NUMNER OF REQUIRED PLUMBING FIXTURES

- K. In each ~~bathroom~~ bathing or toilet ~~room~~ facility, urinals shall not be substituted for more than 67 percent of the required water closets. Where multi-user toilet facilities are not separated by sex, urinals are not permitted.

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.)
The use of toilet and bathing facilities not separated by sex is a design option that is often requested. The model codes has made some revisions to incorporate this into the code. The privacy provisions in the current code are not generally adequate and do not address the specific issues related to school facilities.
2. Why is the proposed code change a reasonable solution?

Currently any option to not separate facilities by sex requires a code alternate and each code alternate is left to the interpretation of the Building Official in each jurisdiction. Adopting these rules will provide direction and clarity on what is required. The general requirements for privacy including dimensional limits are taken from code modifications approved at the April code development hearings for incorporation into the 2027 International codes.

3. What other factors should the TAG consider?

There are a number of uses, primarily in assembly functions where the ratio of required fixtures per occupant for male and female are not equal. How to address this difference when using non-separated toilet facilities is not addressed in the model code nor in this code change proposal. This may lead to some confusion or disparity in how these provisions are applied.

The requirement for the door to be held open could be considered in direct conflict with the Mn accessibility code that requires doors to wheelchair and ambulatory accessible compartments be self closing (MAC 604.9.3)

Accessible signage requirements are also an issue as there is currently no direction as to how to provide signage for identifying ambulatory accessible toilet compartments nor any specific requirement to provide signage at a wheelchair accessible compartment.

Cost/Benefit Analysis

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

The decision to provide toilet facilities not separated by sex is a design decision. While some of the individual requirements listed for designing this option may cost more, they should generally be offset by the reduction in requirements for providing separate rooms. Thus resulting in a potential minor cost savings.

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

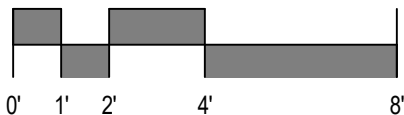
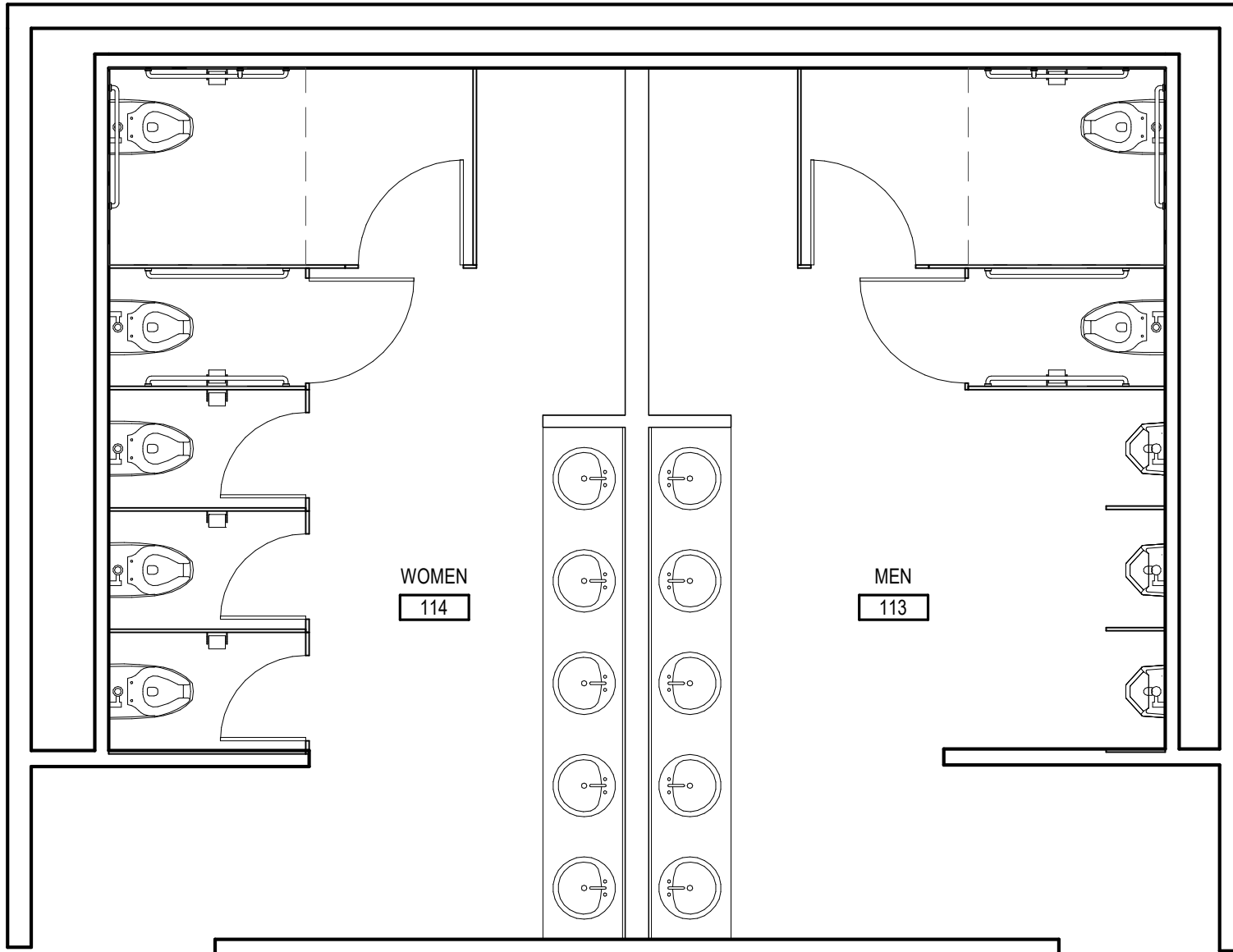
3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?

Not adopting this change will result in continued diverse opinions on alternate compliance.

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.

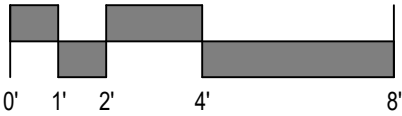
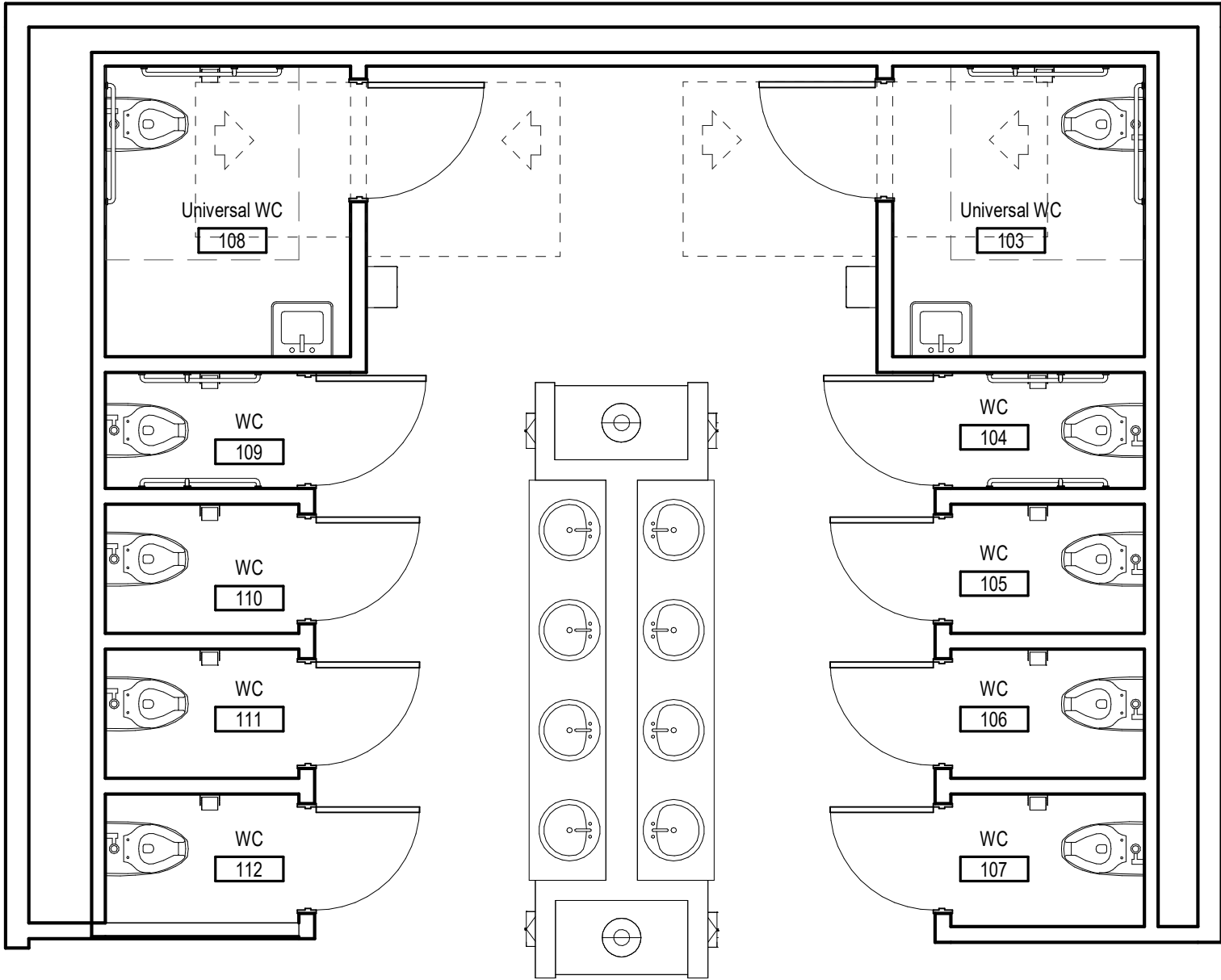
no

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



Each gender has access to 1 ADA compartment and 0 private sinks.

Gender Segregated Restrooms



Each gender has access to 2 ADA compartments and 2 private sinks. Per student access to ADA compartments and private lavatories are increased in Multi-user toilet facilities not separated by sex - refer to comparison chart.

Multi-user toilet facilities NOT separated by sex

TABLE 1

Comparison of Gender Segregated and Individual and Private Restrooms: Access to ADA compartments and Private Lavatories.

| Only E occupancy counted for both methodologies. Additional toilets are located in all schools in assembly areas. | | | | | | | | | | | ADA Compartments per student | | Private Lavatories per student | |
|---|-------------------------------|---|-------|--------|------------|---------------------------------------|---------|------------|-------------|----------------------|---|------------------------|--|------------------------|
| | | Gender Segregated / Gender Private as Constructed | | | | Individual and Private as Constructed | | | | | Gender Segregated per student | Individual and Private | Gender Segregated per student | Individual and Private |
| School | Capacity | | Male | Female | Lavatories | ADA | Toilets | Lavatories | Shared Lavs | ADA (of the toilets) | | | | |
| 1 | Alexandria Area High School | 1,550 | 9-12 | 36 | 36 | 60 | 12 | | | | | 129.17 | | 0 |
| 2 | Humboldt High School | 1,350 | 6-12 | | | | | 30 | 6 | 24 | 12 | | 112.5 | 225.0000 |
| 3 | Como High School | 1,100 | 9-12 | | | | | 32 | 5 | 27 | 10 | | 110 | 220.0000 |
| 4 | Sartell High School | 1,650 | 9-12 | 27 | 27 | 27 | 18 | | | | | 91.67 | | 0 |
| 5 | Sartell Middle School | 978 | 6-8 | 16 | 12 | 20 | 4 | | | | | 244.5 | | 0 |
| 6 | St. Cloud Tech High School | 1,825 | 9-12 | 18 | 18 | 36 | 12 | | | | | 152.08 | | 0 |
| 7 | Bruce Vento Elementary School | 995 | PK-5 | | | | | 31 | 9 | 23 | 16 | | 62.19 | 110.5556 |
| 8 | American Indian Magnet School | 714 | PK-8 | | | | | 37 | 4 | 27 | 10 | | 71.4 | 178.5000 |
| 9 | Rock Ridge HS | 1,260 | 7-12 | | | | | 30 | 12 | 18 | 12 | | 105 | 105.0000 |
| 10 | North Star Elementary School | 500 | K-6 | | | | | 18 | 4 | 14 | 4 | | 125 | 125.0000 |
| 11 | Adams Spanish Immersion | 2,047 | PK-5 | | | | | 42 | 58 | 52 | 22 | | 93.05 | 35.2931 |
| 12 | SEA Olson | 544 | K-5 | | | | | 29 | 28 | 16 | 9 | | 60.44 | 19.4286 |
| 13 | ISLA | 640 | PK-6 | 10 | 11 | 12 | 6 | | | | | 106.67 | | 0 |
| 14 | Apollo High School | 1,600 | 9-12 | 16 | 16 | 32 | 8 | | | | | 200.00 | | 0 |
| 15 | Nashwauk-Keewatin School | 700 | PK-12 | 5 | 5 | 8 | 2 | | | | | 350.00 | | 0 |
| | | | | | | | | | | | 182.0119048 | 92.44717487 | 0 | 169.7962051 |
| | | | | | | | | | | | Per student access to ADA is increased in individual and private model. This data is reflective of actual constructed conditions. | | Per student access to private lavatories is increased in individual and private model. This data is reflective of actual constructed conditions. | |

TABLE 2

Comparison of Gender Segregated / Individual and Private / Multiuser Restrooms as Proposed: Access to ADA compartments and Private Lavatories

| Only E occupancy counted for both methodologies. Additional toilets are located in all schools in assembly areas. | | | | | | | | | | | Assumption: each cluster of toilets contains 5 fixtures (2 ADA) | | | | ADA Compartments per student | | | Private Lavatories per student | | |
|---|-------------------------------|---|-------|--------|------------|---------------------------------------|---------|------------|-------------|----------------------|---|-------------|---|--|-------------------------------|--|--|--------------------------------|------------------------|--|
| | | Gender Segregated / Gender Private as Constructed | | | | Individual and Private as Constructed | | | | | See IBC 2901.1 proposal Multiuser Restrooms in E Occupancies as Proposed | | | | Gender Segregated per student | Individual and Private | Multiuser Restrooms in E Occupancies as Proposed | Gender Segregated per student | Individual and Private | Multiuser Restrooms in E Occupancies as Proposed |
| School | Capacity | | Male | Female | Lavatories | ADA | Toilets | Lavatories | Shared Lavs | ADA (of the toilets) | Toilets | Lavatories | Shared Lavs | ADA (of the toilets) | | | | | | |
| 1 | Alexandria Area High School | 1,550 | 9-12 | 36 | 36 | 60 | 12 | | | | 31 | 13 | 18 | 13 | 129.17 | | 119.23 | 0 | | 119.23 |
| 2 | Humboldt High School | 1,350 | 6-12 | | | | | 30 | 6 | 24 | 12 | 30 | 12 | 19 | 12 | | 112.5 | | 225.0000 | 112.5 |
| 3 | Como High School | 1,100 | 9-12 | | | | | 32 | 5 | 27 | 10 | 32 | 14 | 18 | 14 | | 110 | | 220.0000 | 78.57 |
| 4 | Sartell High School | 1,650 | 9-12 | 27 | 27 | 27 | 18 | | | | | 33 | 15 | 18 | 15 | 91.67 | | 110 | | 110 |
| 5 | Sartell Middle School | 978 | 6-8 | 16 | 12 | 20 | 4 | | | | | 20 | 10 | 10 | 10 | 244.5 | | 97.8 | | 97.8 |
| 6 | St. Cloud Tech High School | 1,825 | 9-12 | 18 | 18 | 36 | 12 | | | | | 37 | 9 | 28 | 9 | 152.08 | | 202.78 | | 202.78 |
| 7 | Bruce Vento Elementary School | 995 | PK-5 | | | | | 31 | 9 | 23 | 16 | 31 | 13 | 18 | 13 | | 62.19 | | 110.5556 | 76.54 |
| 8 | American Indian Magnet School | 714 | PK-8 | | | | | 37 | 4 | 27 | 10 | 37 | 9 | 28 | 9 | | 71.4 | | 178.5000 | 79.33 |
| 9 | Rock Ridge HS | 1,260 | 7-12 | | | | | 30 | 12 | 18 | 12 | 30 | 12 | 18 | 12 | | 105 | | 105.0000 | 105 |
| 10 | North Star Elementary School | 500 | K-6 | | | | | 18 | 4 | 14 | 4 | 18 | 8 | 10 | 8 | | 125 | | 125.0000 | 62.5 |
| 11 | Adams Spanish Immersion | 2,047 | PK-5 | | | | | 42 | 58 | 52 | 22 | 42 | 17 | 25 | 17 | | 93.05 | | 35.2931 | 120.41 |
| 12 | SEA Olson | 544 | K-5 | | | | | 29 | 28 | 16 | 9 | 29 | 12 | 16 | 12 | | 60.44 | | 19.4286 | 45.33 |
| 13 | ISLA | 640 | PK-6 | 10 | 11 | 12 | 6 | | | | | 13 | 6 | 7 | 6 | 106.67 | | 106.67 | | 106.67 |
| 14 | Apollo High School | 1,600 | 9-12 | 16 | 16 | 32 | 8 | | | | | 32 | 14 | 18 | 14 | 200.00 | | 114.29 | | 114.29 |
| 15 | Nashwauk-Keewatin School | 700 | PK-12 | 5 | 5 | 8 | 2 | | | | | 14 | 6 | 8 | 6 | 350.00 | | 116.67 | | 116.67 |
| | | | | | | | | | | | 182.0119048 | 92.44717487 | 103.17 | 0 | 169.7962051 | 103.17 | | | | |
| | | | | | | | | | | | Per student access to ADA is increased in individual and private model. This data is reflective of actual constructed conditions. | | Per student access to ADA is increased over gender segregated in as proposed model. | Per student access to private lavatories is increased in individual and private model. This data is reflective of actual constructed conditions. | | Per student access to private lavs is increased over gender segregated in as proposed model. | | | | |



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: C. Scott Anderson

Date: 07/02/24

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

Model Code: 2024 IBC

Telephone number: 612-246-7303

Code or Rule Section: 2902.1

Firm/Association affiliation, if any: City of Minneapolis

Topic of proposal: 2902.1

Code or rule section to be changed: 2902.1

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 checked="" type="checkbox"/> | <input 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).
Maintain current Mn Amendment exception.

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).
2902.1 charging statement

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.

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.
Add new text as follows:

2902.1 Minimum number of fixtures.

~~Plumbing fixtures shall be provided for the type of occupancy and in the minimum number shown in Table 2902.1. Types of occupancies not shown in Table 2902.1 shall be considered individually by the building official. The number of occupants shall be determined by this code. Occupancy classification shall be determined in accordance with Chapter 3.~~

Plumbing fixtures shall be provided in the minimum number as shown in Table 2902.1 based on the actual use of the *building* or space. Uses not shown in Table 2902.1 shall be considered individually by the code official. The number of occupants shall be determined by this code.

Exception: When approved by the building official, buildings or structures that are normally unoccupied, such as picnic shelters, amphitheaters, small transit stop stations, cold-storage buildings, utility sheds, warming houses, kiosks, concession stands and similar structures, need not be provided with restroom facilities.

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.)
The charging text in the model code is more clear than the Mn Amendment. The Mn amended text also still refers to occupancy classification which has been removed from this code section. Retaining the exception as a Mn Amendment is advisable to ensure consistent enforcement.
2. Why is the proposed code change a reasonable solution?
This change clears up the issue of use vs occupancy and maintains the Mn exception.
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?
Keeping reference to occupancy classification in this section will only cause confusion and result in inconsistent code enforcement.
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: Clayton Talbot

Date: 7/1/2024

Email address: talbo047@umn.edu

Model Code: 2024 IBC

Telephone number: 612-21-7119 Code or Rule Section: IBC 2024 Table 2902.1

Commented [DD1]: Missing digit in phone number

Firm/Association affiliation, if any: University of Minnesota Building Code Department

Topic of proposal: Drinking Fountains

Code or rule section to be changed: Footnote J - Minimum Fixtures Requirement for drinking fountains

Intended for Technical Advisory Group ("TAG"): 1305

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).
- change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
Amendment 2024 IBC Table 2902.1 – Footnote J.
- 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.

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 ~~strike through~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

~~Water or other beverages available through free or fee-based serving or bottle~~ dispensers may be substituted for up to 50 percent of the required number of drinking fountains

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 revised amendment allows for bottle fillers, which are commonly installed with drinking fountains, to be recognized as a similar fixture and be substituted for up to 50 percent of the required drinking fountains.

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

There are several manufacturers that can provide an industry recognized/listed bottle filler. They can be standalone units or be included with either high or low fountain units.

3. What other factors should the TAG consider?

It is very common for students, employees, the public, etc. to carry re-fillable water bottles. and The bottle filler is a realistic option for these individuals to obtain safe drinking water. The existing amendment, which includes an option for fee-based water dispensers, is contradictory to the general building code intent and built environment for providing a minimum quantity of fixtures that can supply safe drinking water free of charge.

Cost/Benefit Analysis

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

The cost to individuals/ the public will decrease because currently, at some facilities, they must purchase drinking water.

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.

NA

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.

NA

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.

NA

Regulatory Analysis

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

Owners, design professionals, contractors and Regulator Agencies.

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.

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?

None

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: 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 instruction 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.

Minnesota Department of Public Safety State Fire Marshal Division

24CCP_97

Fire Code Change Proposal Form

(Submit via email to: fire.code@state.mn.us)

***Please complete all sections. Incomplete forms may be returned for additional information.*

Author/requestor: Forrest Williams

Date: 1-10-2024

Email address: forrest.williams@state.mn.us

Telephone number: 651-769-7784

Organization/Association/Agency, if any: DPS – State Fire Marshal

Code or rule section to be changed (include code or rule title and edition year): MR 7511.1010.1.11 & MR 1305.1010.1.11

Is the subject matter of the proposed change also regulated by the Minnesota Building Code?
YES: NO: UNKNOWN:

***If yes, a [building code change proposal](#) must also be completed and submitted to the Minnesota Department of Labor and Industry – Construction Codes and Licensing Division.*

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).



Minnesota Department of Public Safety State Fire Marshal Division

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

MR 7511.1010.1.11

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.

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

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

1010.1.11 Special detention arrangements. Special detention arrangements meeting the requirements of Sections 1010.1.11.1 through 1010.1.11.4 are permitted only for rooms, other than cells, where a single occupant is ~~the occupants are being~~ temporarily restrained for safety or security reasons. Special detention arrangements shall not be used on egress doorways serving multiple occupants. The use of Sections 1010.1.11.1 through 1010.1.11.4 may be revoked by the fire code official for due cause.

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?

This state amendment has often been misinterpreted by code officials and design professionals, believing this type of locking arrangement can be employed on any egress door, even those serving multiple occupants, provided the reason is for occupant security or safety. However, the intent of this section is to allow a single occupant, who's behavior may pose a danger to themselves or others, to be temporarily detained within a room until



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Minnesota Department of Public Safety State Fire Marshal Division

the threat has passed. The most common use of special detention arrangements is in Group E (educational) occupancies, specifically in special education areas to assist with behavioral issues.

2. Why is the proposed code change a reasonable solution?
It helps clarify the intent of the language and promotes uniform application and enforcement of the provisions. No substantive change are made to the amendment.
3. Is there additional data or information that should be considered?
No

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
No change in cost.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
n/a
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No change in cost.
4. 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? 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?
None, as there is no substantive change to the code provisions.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None.
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
n/a



Minnesota Department of Public Safety State Fire Marshal Division

4. 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. The purpose is only for clarification of intent and to promote consistent application and enforcement.
5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
By not making these clarifications, fire and building code officials and design professionals will continue to misapply these provisions. Once these mistakes are identified, they must be corrected, causing additional and unnecessary costs to the property owner.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No.
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.
n/a

***Please complete all sections. Incomplete forms may be returned for additional information.*



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Minnesota Department of Public Safety State Fire Marshal Division

24CCP_101

Fire Code Change Proposal Form

(Submit via email to: fire.code@state.mn.us)

***Please complete all sections. Incomplete forms may be returned for additional information.*

Author/requestor: [Forrest Williams, Supervisor \(SFM\)](#)

Date: [5-17-2024](#)

Email address: forrest.williams@state.mn.us

Telephone number: [651-769-7784](tel:651-769-7784)

Organization/Association/Agency, if any: [DPS – State Fire Marshal](#)

Code or rule section to be changed (include code or rule title and edition year): [2024 IFC/IBC 1010.2.6 \(stairway doors\)](#)

Is the subject matter of the proposed change also regulated by the Minnesota Building Code?
YES: NO: UNKNOWN:

***If yes, a [building code change proposal](#) must also be completed and submitted to the Minnesota Department of Labor and Industry – Construction Codes and Licensing Division.*

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).



Minnesota Department of Public Safety State Fire Marshal Division

2024 IFC/IBC 1010.2.6 (stairway doors)

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

MR 7511.1010, Section 1010.1.9.12 and MR 1305.1010, Section 1010.1.9.12

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.

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 words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

(2024 IFC/IBC)

[BE] 1010.2.6 Stairway doors.

Interior stairway means of egress doors shall be openable from both sides without the use of a key or special knowledge or effort.

Exceptions:

1. In stairways serving not more than four stories, doors are permitted to be locked from the side opposite the egress side.

~~1.2.~~ Stairway discharge doors shall be openable from the egress side and shall only be locked from the opposite side.

~~2.3.~~ This section shall not apply to doors arranged in accordance with Section 403.5.3 of the International Building Code.



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~~3.4.~~ Stairway exit doors shall not be locked from the side opposite the egress side, unless they are openable from the egress side and capable of being unlocked simultaneously without unlatching by any of the following methods:

~~3.1.4.1~~ Shall be capable of being unlocked individually or simultaneously upon a signal from the fire command center, where present, or a signal by emergency personnel from a single location inside the main entrance to the building.

~~3.2.4.2~~ Shall unlock simultaneously upon activation of a fire alarm signal when a fire alarm system is present in an area served by the stairway.

~~3.3.4.3~~ Shall unlock upon failure of the power supply to the electric lock or the locking system.

~~4.5.~~ Stairway exit doors shall be openable from the egress side and shall only be locked from the opposite side in Group B, F, M and S occupancies where the only interior access to the tenant space is from a single exit stairway where permitted in Section 1006.3.4.

~~5.6.~~ Stairway exit doors shall be openable from the egress side and shall only be locked from the opposite side in Group R-2 occupancies where the only interior access to the dwelling unit is from a single exit stairway where permitted in Section 1006.3.4.

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.
[MR 7511.1010, Section 1010.1.9.12](#) and [MR 1305.1010, Section 1010.1.9.12](#)

Need and Reason

1. Why is the proposed code change needed?
The 2024 IFC/IBC has revised this section by adding an additional exception, so this change incorporates a current state amendment into the updated IFC/IBC language, thus maintaining the current allowance for stairway doors serving 4 or fewer stories to be locked on the side opposite egress in order to prevent building reentry while allowing for additional release options now included in the model code.
2. Why is the proposed code change a reasonable solution?
This change is reasonable because the allowance currently exists under MN Rules, 7511 and 1305.
3. Is there additional data or information that should be considered?



Minnesota Department of Public Safety State Fire Marshal Division

This language is similar to NFPA 101, Life Safety Code, which allows stairway enclosure doors serving 4 or fewer stories to be locked on the side opposite egress in order to prevent building reentry.

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
[Cost neutral, as this provision already exists under current rule.](#)
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
[N/A](#)
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
[No](#)
4. 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? 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?
[Fire and building code officials, design professionals, construction industries, electrical contractors, and building owners and operators.](#)
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
[None](#)
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
[No. This provision already exists under current MN Rules.](#)
4. 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](#)



Minnesota Department of Public Safety State Fire Marshal Division

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
N/A. This provision already exists under current MN Rules.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
The cost of construction would increase for multi-story buildings having 4 or fewer stories. Under current rule, interior stairway doors serving 4 or fewer stories are allowed to have the doors secured from the non-egress side in order to prevent reentry for the purposes of maintaining building/tenant security. By not incorporating our current exemption for stairways serving 4 or fewer stories, an electrified door-release system would be necessary in order for these doors to be secured against building reentry.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.
N/A

***Please complete all sections. Incomplete forms may be returned for additional information.*



Updated July 2022



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: C. Scott Anderson

Date: 5/06/24

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

Model Code: 2024 IBC

Telephone number: 612-246-7303

Code or Rule Section: Table 1010.2.4

Firm/Association affiliation, if any: City of Minneapolis

Topic of proposal: Table 1010.2.4

Code or rule section to be changed: Table 1010.2.4

Intended for Technical Advisory Group ("TAG"):

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).
- 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.
Table 1010.2.4

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.
Add new text as follows:

TABLE 1010.2.4

MANUAL BOLTS, AUTOMATIC FLUSH BOLTS AND CONSTANT LATCHING BOLTS ON THE INACTIVE LEAF OF A PAIR OF DOORS

| APPLICATION WITH A PAIR OF DOORS WITH AN ACTIVE LEAF AND AN INACTIVE LEAF | THE PAIR OF DOORS IS REQUIRED TO COMPLY WITH SECTION 716 | PERMITTED USES OF MANUAL BOLTS, AUTOMATIC FLUSH BOLTS AND CONSTANT LATCHING BOLTS ON THE INACTIVE LEAF OF A PAIR OF DOORS. | | |
|--|--|--|------------------------------------|-------------------------|
| | | Surface- or flush-mounted manual bolts | Automatic flush bolts | Constant latching bolts |
| Group B, F, <u>M</u> or S occupancies with occupant load less than 50. | No | P | P | P |
| | Yes | NP | NP <u>p^b</u> | <u>p^b</u> |
| Group B, F, <u>M</u> or S occupancies where the building is equipped with an automatic sprinkler system in accordance with Section 903.3.1.1 and the inactive leaf is not needed to meet egress capacity requirements. | No | P | P | P |
| | Yes | NP | NP <u>p^b</u> | <u>p^b</u> |
| Group I-2 patient care and sleeping rooms where inactive leaf is not needed to meet egress capacity requirements. | No | NP | NP <u>p^b</u> | P |
| | Yes | NP | NP ^b | P |
| Any occupancy where panic hardware is not required, egress doors are used in pairs, and where both leaves are required to meet egress capacity requirements. | No | NP | P | NP |
| | Yes | NP | NP <u>p^b</u> | NP |
| Storage or equipment rooms where the inactive leaf is not needed to meet egress capacity requirements. | No | p ^a | P | P |
| | Yes | p ^a | P | P |

P = Permitted. NP = Not Permitted.

- a. Not permitted on corridor doors in group I-2 occupancies where corridor doors are required to be positive latching
 - b. Permitted only where both doors-leafs are self closing or automatic closing, and both leaves are arranged to automatically latch in the closed position. ~~are provided with a coordinator that causes the inactive leaf to be closed prior to the active leaf~~
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.)

Mercantile occupancy (M) is added to the first two rows of Table 1010.2.4 to specifically permit manual bolts, automatic flush bolts, or constant latching bolts on the inactive leaf of a pair of doors. A common application of these hardware items are the doors to automobile showrooms, where the inactive leaf opens wide enough to permit cars to be rolled into and out of the showroom. These two rows in Table 1010.2.4 are where the inactive leaf is not needed for egress capacity.

Also, footnote b is added to two cells in the right-hand column. In these applications where the doors are required to comply with Section 716, these doors are required by other parts of the IBC to be opening protectives, and required to be self-closing or automatic-closing, and to latch when closed. This nuance was overlooked when the table was included in the 2024 IBC.

Footnote b currently is not quite accurate as some pairs of doors are designed such that both door leaves (the active leaf and the inactive leaf) close and latch without needing a coordinator to close the inactive leaf prior to the active leaf.

In Group I-2, patient care and sleeping room doors are, for all practical purposes, not required by the IBC to comply with Section 716 (i.e. to be fire rated doors). Thus, it is appropriate to remove this partial row for Group I-2 patient care rooms and sleeping rooms.

IBC Section 407.3.1 specifically states that Group I-2 corridor doors are not required to be self-closing or automatic-closing except in the very limited situations where the corridor doors are in a wall required to be rated by Section 509.4 Incidental uses, or for enclosure of a vertical opening or an exit. In Group I-2, patient care and sleeping room doors are essentially not installed in these situations.

Also, in Group I-2, patient care and sleeping room doors are not required to be self-closing or automatic-closing, and the footnote in the cell under Automatic flush bolts should not be there.

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

This change clears up a couple of missed issues when the table was adopted in the 2024 code and clarifies some additional requirements.

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 result in continued disagreement between code officials and designers as to how this code provision is to 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.
This change was adopted by the ICC egress committee at the April 2024 Code Action Hearings by a vote of 12-1 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 be considered by the TAG.



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: C. Scott Anderson

Date: 5/2/24

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

Model Code: 2024 IBC

Telephone number: 612-246-7303

Code or Rule Section: 1010.2.8.2

Firm/Association affiliation, if any: City of Minneapolis

Topic of proposal: 1010.2.8.2

Code or rule section to be changed: 1010.2.8.2

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).
1010.2.8.2
- 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.
1010.2.8.2

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.

~~**1010.2.8.2 — Rooms with electrical equipment.**~~

~~Exit or exit access doors serving transformer vaults, rooms designated for batteries or energy storage systems, or modular data centers shall be equipped with panic hardware or fire exit hardware. Rooms containing electrical equipment rated 800 amperes or more that contain overcurrent devices, switching devices or control devices and where the exit or exit access door is less than 25 feet (7620 mm) from the equipment working space as required by NFPA 70, such doors shall not be provided with a latch or lock other than panic hardware or fire exit hardware. The doors shall swing in the direction of egress travel.~~

1010.2.8.2 Rooms with electrical equipment. Where an electrical equipment room, enclosure, or vault meets one or more of the following criteria, exit doors or exit access doors shall comply with Section 1010.2.8.2.1.

1. Room, enclosure, or vault for electrical equipment of 1000 volts, nominal, or less and rated 800 amperes or more that contain overcurrent devices, switching devices, or control devices and where the exit door or exit access door is less than 25 feet (7620 mm) from the equipment working space as required by NFPA 70.
2. Vault for electrical equipment of over 1000 volts, nominal.
3. Room or enclosure for electrical equipment of over 1000 volts, nominal, and where the exit door or exit access door is less than 25 feet (7620 mm) from the equipment working space as required by NFPA 70.
4. Transformer vault.
5. Room, enclosure, or vault for batteries or energy storage systems having a capacity greater than 1 kWh (3.6MJ).
6. Modular data center.

Add new text as follows:

1010.2.8.2.1 Electrical equipment room doors. Exit doors and exit access doors of such electrical room, enclosure, or vault shall swing in the direction of egress travel, and locks and latches on the doors shall be provided with panic hardware or fire exit hardware.

- 1011** 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 proposal is intended to be editorial and to more closely mesh with the requirements in NFPA 70 National Electrical Code.

The IBC, in Chapter 27, requires compliance with NFPA 70. The current text in Section 1010.2.8.2 closely follows requirements in NFPA 70 regarding panic hardware and fire exit hardware, but the revised text more closely follows the requirements in NFPA 70, making it easier to understand what's required to comply with NFPA 70.

The charging language of 1010.2.8.2 is primarily the existing language in 1010.2.8.2 with editing to more closely mesh with terms used in NFPA 70. For example, electrical enclosures of wire fence-like material surrounding electrical equipment may not be considered an electrical equipment room – hence the proposed revisions to electrical equipment room, enclosure, or vault.

The criteria in Items 1 through 6 are from current requirements in 1010.2.8.2 and augmented by requirements in these sections of NFPA 70:

1. 110.26(C)(3) – electrical equipment rooms, enclosures, or vaults for 1000 volts or less
2. 110.31(A)(4) – electrical equipment vaults for more than 1000 volts
3. 110.33(A)(3) – electrical equipment rooms or enclosures for more than 1000 volts
4. 450.43(C) – transformer vaults
5. 480.1 and 480.10(E) – batteries and energy storage systems
6. 646.19 – modular data centers

Also, these six criteria were separated into items for easier correlation to NFPA 70 requirements.

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

It correlates the requirements with NFPA 70 thus making compliance more readily achievable

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 continue the difficulty in gaining compliance with two different codes that tend to fall under two different jurisdictions

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 revision will result in better code compliance

***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: Greg Metz

Date: 8/18/2022

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 1011.2 Stairway Width and Capacity

Code or rule section to be changed: MR 1305

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).

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.
IBC 1011.2 Stairway width and capacity

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 ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

2024 IBC

1011.2 Width and capacity. The required capacity of stairways shall be determined as specified in Section 1005.1, but the minimum width shall not be less than 44 inches (1118 mm). The minimum width for stairways that serve as part of the *accessible mean of egress* shall comply with Section 1009.3. Encroachments by handrails and other items equal to the handrail encroachment on each side and located below the handrails are permissible.

Exceptions:

1. Stairways serving an *occupant load* of less than 50 shall have a width not less than 36 inches (914 mm).
 2. *Spiral stairways* as provided for in Section 1011.10.
 3. Where an incline platform lift or *stairway* chairlift is installed on *stairways* serving occupancies in Group R-3, or within *dwelling units* in occupancies in Group R-2, a clear passage width of not less than 20 inches (508 mm) shall be provided. Where the seat and platform can be folded when not in use, the distance shall be measured from the folded position.
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?
There is confusion regarding application of the minimum clear width, especially at 36 inch wide stairways where handrail encroachment allows a passable narrowing to 27 inches. The confusion is in regards to encroachments other than handrails located below the handrail level.
2. Why is the proposed code change a reasonable solution?
ICC has provided guidance that the walkline of a stairway is narrower than the shoulder-width requirements for a stair, and that encroachments below the handrail elevation may extend as far into the stairway as the handrail itself without interfering with stairway passage.
3. What other considerations should the TAG consider?
None

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
No. This is a clarification of encroachment allowances which has the potential but not the guarantee to save money on projects.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No

4. 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? 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, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No
4. 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.

The proposed change is the lowest impact option with the potential to produce desired results.

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Continued confusion regarding encroachment allowances below the handrail, if any.
Potential increased construction cost for code minimum stairways designed with steel stringers which must project into the stairway typically 1 ½ inches on each side which would be acceptable under the proposed change, and could be interpreted as acceptable or not acceptable otherwise.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

***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: [Britt McAdamis](#)

Date: [04/23/2024](#)

Email address: britt.mcadamis@state.mn.us

Model Code: [2024](#)

Telephone number: [651-284-5276](#)

Code or Rule Section: [1011.15](#)

Firm/Association affiliation, if any: [DLI/CCLD](#)

Topic of proposal: [Ships ladders](#)

Code or rule section to be changed: [1305.1011.15](#)

Intended for Technical Advisory Group ("TAG"): [1305](#)

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 checked="" type="checkbox"/> | <input 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).
[1011.15 Ships ladders](#)

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
[1305.1011.15 Ships ladders](#)

delete language contained in the model code book? If so, list section(s).
[1011.15 Ships ladders](#)

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.

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

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.

MR 1305.1011.15

1011.15 Ships ladders. Ships ladders ~~constructed as required for permanent stairs in accordance with the Minnesota Mechanical Code, Minnesota Rules, part 346.306, subpart 1, amending IMC Section 306.5,~~ shall be permitted to be used as a means of egress component at the following locations:

1. ~~Ships ladders are permitted to be used in~~ In Group I-3 ~~occupancies for as a component of a means of egress to and from at~~ control rooms or elevated *facility* observation stations not more than 250 square feet (23 m²) ~~in floor area. with not more than 3 occupants.~~

2. For access to unoccupiable roofs.

~~3. 2. Ships ladders are permitted to be used as~~ As a component for means of egress at recessed or elevated floors or platforms when the area served has an occupant load of five or fewer and the space meets all of the following criteria:

3.1. Access to the area served is limited to building facilities staff, maintenance staff, employees, or other authorized personnel.

3.2. Required access to the area served is limited and periodic.

3.3. The area served is used for building maintenance service functions, or for equipment access or monitoring.

3.4. The area served is not required to have a second means of egress by other provisions of this code.

3.5. The area served is not classified as a Group H occupancy.

~~4. 3. Ships ladders are permitted to be used for~~ For access to mechanical equipment and appliances on roofs or elevated structures unoccupied spaces in accordance with the *Minnesota Mechanical Code*.

Following code language from 1346.0306.5 and IBC 1011.15, 1011.15.1 and 1011.15.2 merged to new 1305 code section.

1011.15.1 Ships ladder construction. The ~~permanent stair~~ ships ladder shall, at a minimum, meet the following:

1. The ~~stair~~ ships ladder shall be installed at an angle of ~~not more than 60-50-70~~ degrees measured from the horizontal plane.

2. ~~The stair shall have flat treads at least 6 inches (152 mm) deep and a clear width of at least 18 inches (457 mm) with equally spaced risers at least 10.5 inches (267 mm) high and not exceeding 14 inches (356 mm). Ship's ladders shall have a minimum tread depth of 5 inches (127 mm). The tread shall be projected such that the total of the tread depth plus the nosing projection is not less than 8 1/2 inches (216 mm). The maximum riser height shall be 9 1/2 inches (241 mm).~~

~~3. The stair shall have intermediate landings not exceeding 18 feet (5.5 m) vertically.~~

~~4. Continuous handrails shall be installed on both sides of~~

~~the stair. Handrails shall be provided on both sides of ship's ladders.~~

~~4. The minimum clear width at and below the handrails shall be 20 inches (508 mm).~~

~~5. Ship's ladders shall be designed for the live loads indicated in Section 1607.10.~~

~~5. Interior stairs shall terminate at the under side of the roof at a hatch or scuttle of at least 8 square feet (0.74 m²) with a minimum dimension of 20 inches (508 mm).~~

~~6. When a roof access hatch or scuttle is located within 10 feet (3.0 m) of a roof edge, a guard shall be installed in accordance with IMC Section 304.11.~~

~~6. 7. Exterior stairs shall terminate at the roof access point or at a level landing of at least 8 square feet (0.74 m²) with a minimum dimension of 20 inches (508 mm). The landing shall have a guard installed in accordance with IMC Section 304.11.~~

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.

1346.0306.5

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.)
The body language is amended to indicate the areas where a ships ladder can be used and not direct all compliance to a permanent stair in accordance with the MN mechanical code.

Item 1 is rewritten to the same language as the IBC for Group I-3 for consistency with the model code.

Item 2 is added in allow ships ladders to be used to access unoccupiable roofs as permitted by the IBC.

Item 3 is renumbered and rewritten for constancy with the other items, content remains the same as the current amendment.

Item 4 is renumbered and reworded to be consistent with the terminology of the MN Mechanical Code.

New Section 1011.15.1 is taken from the current MR 1346.0306.5 provisions for a permanent stair and merged with the IBC requirements from section 1011.15, 1011.15.1 and 1011.15.2 for ships ladders. The requirements and dimensions were derived from the IBC and comparing the current MR 1346.0306.5 along with OSHA standards to be aligned with industry standards. Other subitems were removed as they are addressed elsewhere in the mechanical code and or building code and are not necessary to be included here.

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

Current MR directs the designer to the MMC for construction requirements for a ships ladder, when a ships ladder is permitted by the MBC for uses other than mechanical access, therefor it is reasonable to keep the construction requirements within the building code which is also in line with the IBC. Additionally, the architect is typically the designer for roof access and or mechanical access components and is already operating in the building code for code compliance.

Current MR 1346.0306.5 which contains the construction requirements for a permanent stair, is not using the same terminology or dimensional uniformity that is seen in both the IBC and OSHA standards for ships ladders.

It is reasonable to maintain the building code to be as close to the model IBC as possible while mirroring the MR from 1346 for consistency across both codes. Proposal is to change 1346.0306.5 to mirror the new code section proposed as 1011.15.1.

3. What other factors should the TAG consider?

MR 1346.0306.5 has amended this section for climate factors due to our unique weather conditions and limits the use of ladders as access to mechanical equipment for safety considerations.

Cost/Benefit Analysis

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

This proposal is a clarification of the code requirements and would impose no cost increase.

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?
Architects, Engineers, Mechanical contractors
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 significant changes, reorganization and relocation of code requirements.
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?
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.

***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: 4/22/24

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

Model Code: 2024 IBC

Telephone number: 612-246-7303

Code or Rule Section: 1014.8
Exceptions

Firm/Association affiliation, if any: City of Minneapolis

Topic of proposal: 1014.8 Exceptions

Code or rule section to be changed: 1014.8 Exceptions

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).
1014.8 Exceptions
- 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.

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.

1014.8 Clearance.

Clear space between a handrail and a wall or other surface shall be not less than 1 / inches (38 mm). A handrail and a wall or other surface adjacent to the handrail shall be free of any sharp or abrasive elements.

Exceptions:

- ~~1. A decrease in the clearance due to the curvature or angle of handrail returns shall be allowed.~~
- ~~2. Mounting flanges not more than / - inch (12.7 mm) in thickness at the returned ends of handrails shall be allowed.~~

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.)
2024 IBC added 2 exceptions to section 1014.8. These exceptions would allow for two conditions prior to the minimum handrail extension being met. The conflict these exceptions create in the IBC is that neither of these exceptions are allowed to be done prior to the minimum extension length being met, first per Sections 505.5 & 505.6 in the 2017 ICC A117.1 Standard, and prior additions, and second the same Sections 505.5 & 505.6 in the 2010ADA - ADA Standards for Accessible Design.
Additionally, the 2024 IBC section 1014.7 added the text, "and shall extend the required minimum length before any change in direction or decrease in the clearance required by Section 1014.5 or 1014.8."
The 2 exceptions to 1014.8 will only create the conflict in code language by allowing conditions that are not allowed by 1014.7, 2010ADA, nor A117.1 within the minimum length of the handrail extension.
2. Why is the proposed code change a reasonable solution?
Corrects an inadvertent conflict in code language from previous revisions.
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 result in a conflict within the code as well as a conflict with other construction standards
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 10-4 and is unlikely to be overturned at the final action hearings and voting. Regardless of the ICC actions this code conflict needs to be corrected.

***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: 4/22/24

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

Model Code: 2024 IBC

Telephone number: 612-246-7303

Code or Rule Section: 1015.2

Firm/Association affiliation, if any: City of Minneapolis

Topic of proposal: 1015.2

Code or rule section to be changed: 1015.2

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.
1015.2

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.

Add new text as follows:

1015.2 Where required. Guards shall be located along open-sided walking surfaces, such as mezzanines, equipment platforms, aisles, stairs, ramps and landings, that are located more than 30 inches (762 mm) measured vertically to the floor or grade below at any point within 36 inches (914 mm) horizontally to the edge of the open side, and at the perimeter of occupiable roofs, and at walking surfaces near retaining walls in accordance with Section 1807.2.5. Guards shall be adequate in strength and attachment in accordance with Section 1607.9

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.)
2024 IBC added the requirement for guards at retaining wall to section 1807.2.5 which is a section not normally reviewed by designers nor inspectors with regard to guard requirements. A pointer is needed to ensure that this requirement is not missed.
2. Why is the proposed code change a reasonable solution?
The unique location of the guard requirement in section 1807 requires a reference to ensure compliance.
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 likely result in this requirement being inconsistently enforced.
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 12-2 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: Greg Metz

Date: 8/12/2022

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 1023.5 Stairway Penetrations

Code or rule section to be changed: MR 1305

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).

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.
IBC 1023.5 Penetrations.

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 ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

IBC 1023.5 Penetrations. Penetrations into or through interior exit stairways and ramps are prohibited except for the following:

1. Equipment and ductwork necessary for independent ventilation or pressurization.
 2. Fire protection systems where penetrations are limited to the penetration of sprinklers serving the exit stairway or exit ramp enclosure.
 3. Security systems that serve the exit stairway or ramp.
 4. Wiring that serves the exit stairway or ramp.
 5. Two-way communication systems that serve the exit stairway or ramp.
 6. Electrical raceway for fire department communication systems.
 7. Electrical raceway serving the interior exit stairway or ramp and terminating in a steel box not exceeding 16 square inches.
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?
Fire protection systems are frequently routed through stairway shafts to save cost. The sprinkler piping is cause for multiple penetrations in the protected enclosure when the purpose for the penetration is not serving to enhance enclosure protection but rather other parts of the building
2. Why is the proposed code change a reasonable solution?
Fire protection systems is the only item listed that does not specifically state that the penetration is strictly limited to those penetrations directly serving the protected enclosure.
3. What other considerations should the TAG consider?

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
No cost change.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. 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? 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, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No
4. 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.

The proposed change is the lowest impact option with the potential to produce desired results.

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Continued installation of fire sprinkler distribution piping in stair enclosures with multiple penetrations through the protected enclosure.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

***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

Telephone number: 612-246-7303

Code or Rule Section: 1027.2

Firm/Association affiliation, if any: City of Minneapolis

Topic of proposal: 1027.2

Code or rule section to be changed: 1027.2

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.
1027.2

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 ~~striethrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

Add new text as follows:

1027.2 Use in a means of egress.

Exterior exit stairways shall not be used as an element of a required means of egress for Group I-2 occupancies. For occupancies in other than Group I-2, exterior exit stairways and ramps shall not be used as an element of a required means of egress ~~for buildings exceeding six stories above grade plane or that are high-rise buildings, where the highest walking surface of the excterio exit stairway or ramp exceeds 65 feet above the lowest finishe grade below the stairway.~~

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 change ties the limits of exterior exit stairs to a specific height of the landing above grade below. 65' (20M) is the height at which significant vertigo will appear in most individuals. See NIH published studies by D Huppert – 2020 and R Teggi 2019. It makes sense to use this limitation as it is specific to the stair in question nstead of a building classification. As currently written in code, if the building is a highrise or exceeds 6 stories then no exterior stair may be permitted regardless of the height or location of the stair.

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

This change addressed the specific issue of the exterior stair.

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 may result in reduced cost of construction because now exterior stairs may be used in situations where they previously would not have been allowed.

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 result in continued difficulty in use of the exterior exit stair provisions.
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 be considered by the TAG.



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Greg Metz

Date: 8/12/2022

Revised: 6/6/2024

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 1028.5 Exit Discharge Access to Public Way

Code or rule section to be changed: MR 1305

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).
- 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.
IBC 1028.5 Access to Public Way

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 ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

IBC 1028.5 Access to a public way. The *exit discharge* shall provide a direct and unobstructed access to a *public way*. The surface of the exit discharge to the public way shall be a maintainable surface able to be cleared free of ice and snow.

Exception: Where access to a *public way* cannot be provided, a safe dispersal area shall be provided where all of the following are met:

1. The area shall be of a size to accommodate not less than 5 square feet (0.46 m²) for each *person*.
 2. The area shall be located on the same lot not less than 50 feet (15.24 m) away from the *building* requiring egress.
 3. The area shall be permanently maintained and identified as a safe dispersal area. The safe dispersal area shall be a maintainable surface able to be kept free and clear of ice and snow.
 4. The area shall be provided with a safe and unobstructed path of travel from the *building* having a maintainable surface able to be kept free and clear of ice and snow.
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?
Exit discharge to turf or landscaped areas are ineffective as means of egress during the six months when the ground can be covered with ice and snow.
2. Why is the proposed code change a reasonable solution?
It does not dictate specific surface requirements but does reinforce that means of egress must be unobstructed. In Minnesota, snow and ice can obstruct the means of egress
3. What other considerations should the TAG consider?
None

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
No cost change. This is a code clarification specific to Minnesota climate. The model code already requires means of egress to be clear and unobstructed. The addition merely clarifies that snow and ice are obstructions.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. 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? 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, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No
4. 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.

The proposed change is the lowest impact option with the potential to produce desired results.
5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Continued arguments over whether it is acceptable for exit discharge doors to discharge to a stoop and then landscaping or turf.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

***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: Greg Metz

Date: 8/24/2022

Revised: 5/15/2024

Revised 6/6/2024

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC ~~1029.2~~ 1030.2 Assembly Main Exit

Code or rule section to be changed: MR 1305

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).
IBC 1029.2 Assembly main exit

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.

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 ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

1030.2 Assembly main exit. A *building*, room or space used for assembly purposes that has an *occupant load* of greater than 300 ~~and is~~ shall be provided with a main *exit*. ~~that~~ The main exit shall be of sufficient capacity to accommodate not less than one-half of the *occupant load*. ~~but~~ Each exit capacity shall be not less than the total required capacity of all *means of egress* leading to ~~the~~ that exit. Where the *building* is classified as a Group A occupancy, the main *exit* shall front on not less than one street or an unoccupied space of not less than 10 feet in width that adjoins a street or *public way*. ~~In a building, room or space used for assembly purposes where there is not a well-defined main exit or where multiple main exits are provided, exits shall be permitted to be distributed around the perimeter of the building provided that the total capacity of egress is not less than 100 percent of the required capacity.~~

Exception: In assembly occupancies, rooms or spaces having an occupant load of 300 or more where there is no well-defined main exit or where multiple exits are provided, exits shall be permitted to be distributed around the perimeter of the building provided that:

1. Some of the distributed exits shall be grouped to account for the total width required for the main exit and shall, as a group, count as one exit, and
2. The total number of exits shall comply with Section 1006.2.1 and subsections when the main exit grouping counts as one exit, and
3. The total width of egress is not less than 100 percent of the required width.

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?
The model code language is changed and is very unclear. Interpretation will lead to non-uniform application of this section across the state.
2. Why is the proposed code change a reasonable solution?
The revised language proposed represents the interpretation and application consistent with DLI/CCLD protocols and would result in no change to the application of this section.
3. What other considerations should the TAG consider?

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
No. The code change proposed will result in consistency with the current building code.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No

4. 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? 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, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No
4. 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.

The proposed change is the lowest impact option with the potential to produce desired results.

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Wide interpretation of when main exits are required and what it takes to avoid/disregard this section. Model code can be interpreted as optional. Where the occupant load is greater than 300 and a main exit is provided then follow these requirements. If a main exit is not provided, the rest is essentially moot.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

***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: Greg Metz

Date: 8/23/2022

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 1202.1 Ventilation- General

Code or rule section to be changed: MR 1305

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).
IBC 1202.1 Ventilation- General

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.

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 ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

2020 MSBC current amendment

1202.1 General. Buildings shall be provided with ~~natural ventilation in accordance with Section 1202.5~~ or mechanical ventilation in accordance with Minnesota Rules, Chapter 1346. For additional ventilation requirements, see Minnesota Rules Chapters 1322 and 1323 as applicable. Not less than one space within a dwelling unit shall comply with natural ventilation in accordance with Section 1202.5 in addition to complying with mechanical ventilation requirements.

Exceptions:

1. Buildings or portions thereof that are not intended for normal human occupancy, or where the primary purpose is not associated with human comfort.
 2. Group U occupancies.
 3. Spaces not defined as conditioned space by the Minnesota Energy Code may comply with Section 1202.5 Natural Ventilation.
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?

To clarify that natural ventilation is not viable in Minnesota. Natural ventilation relies upon being able to open doors and windows to fully ventilate a space at any time of year AND still maintain minimum temperatures. The result is oversizing of mechanical equipment to heat a space to accommodate design temperatures (-15°F in the twin cities) with the windows and doors open and maintain a minimum indoor temperature of 68°F throughout the habitable space.

The building code is the minimum standard, and there is currently no requirement that a dwelling unit is provided with openings to the outside. The code becomes the standard for the poorest of the poor who may not have the funds to air condition during summer months and need to be able to open a space to the outside to cool their dwelling.

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

The Minnesota Mechanical Code Section 401.3 requires ventilation when rooms or spaces are occupied. Minnesota Building Code Section 1204.1 requires that spaces intended for human occupancy shall be capable of being heated to a minimum indoor temperature of 68°F. Since Minnesota's weather requires heating 6 months of the year, it is reasonable to have the doors and windows closed while the heat is on and control the ventilation.

Operable windows in at least one habitable space is not unreasonable in order to ensure that everyone has access to outdoor air in at least one space.

3. What other considerations should the TAG consider?
Minnesota Energy Code

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.

No. The cost to provide a correctly sized mechanical ventilation system will be offset by the size reduction in correctly sized mechanical heating equipment when spaces are being naturally ventilated at design heating temperatures.

2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. 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? 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, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No
4. 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.

The proposed change is the lowest impact option with the potential to produce desired results.

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
Continued mis-use of natural ventilation as a means for space ventilation without adequately sizing mechanical heating systems to comply with code requirements, resulting in poor indoor air quality.

Without including a requirement for operable windows in at least one space within a dwelling unit, all dwelling units may be fitted with fixed glazing as a cost-saving measure making air conditioning mandatory. Those forced into minimum standard housing are typically financially challenged and would be required to air condition in order to be comfortable.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No

8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

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CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Greg Metz

Date: 8/30/2022

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 1202.2.1 Ventilated Attics and Rafter Spaces
(Smart Vapor Retarders)

Code or rule section to be changed: MR 1305

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).

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.
IBC 1202.2.1 Exception

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 ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

Exception: The net free cross-ventilation area shall be permitted to be reduced to 1/300 provided ~~both~~ all of the following conditions are met:

1. In Climate Zone 6, a vapor retarder with a perm rating of 1.0 or lower under 30 percent or lower humidity conditions and having a perm rating of 5.0 or higher in 60 percent or higher humidity conditions is installed on the warm-in-winter side of the ceiling.
 2. In Climate Zones 6, 7 and 8, a Class I or II vapor retarder is installed on the warm-in-winter side of the ceiling.
 3. At least 40 percent and not more than 50 percent of the required venting area is provided by ventilators located in the upper portion of the attic or rafter space. Upper ventilators shall be located not more than 3 feet (914 mm) below the ridge or highest point of the space, measured vertically, with the balance of the ventilation provided by eave or cornice vents. Where the location of wall or roof framing members conflicts with the installation of upper ventilators, installation more than 3 feet (914 mm) below the ridge or highest point of the space shall be permitted.
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?
More and more buildings in southern and central Minnesota are air conditioned during the warm humid summer months. The increase in the prevalence of air conditioning combined with the more recent increase in both temperature and humidity during the summer months increase the likelihood of condensation and wetting behind standard vapor retarders during summer conditions.
2. Why is the proposed code change a reasonable solution?
Smart vapor retarders can be high tech products or can be as simple and inexpensive as kraft paper backed insulation with sealed edges. Smart vapor retarders are an easy way to incorporate best practices for building science and building longevity.
3. What other considerations should the TAG consider?
Smart vapor retarders in walls within Climate Zone 6, Section 1404.3

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
No. The proposed describes a performance requirement that can be met with inexpensive materials which may already be incorporated into construction.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. 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? 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, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No
4. 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.

The proposed change is the lowest impact option with the potential to produce desired results.

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Condensation problems in ceiling/attic spaces resulting in microbial growth, reduction in indoor air quality, and moisture damage to roof structural materials and ceiling materials.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

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CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Greg Metz

Date: 8/23/2022

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 1202.4.2 Under floor ventilation in cold climates

Code or rule section to be changed: MR 1305

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).
IBC 1202.4.2
 - 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.
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 ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

1202.4.2 Ventilation in cold climates. In ~~extremely cold climates~~ Climate Zone 6 and Climate Zone 7, where a ventilation opening will cause a detrimental loss of energy, ventilation openings to the interior of the structure shall be provided crawl spaces shall comply with one of the following:

1. Crawl spaces shall be thermally isolated from the building interior in accordance with the Minnesota Energy Code and ventilation shall be provided in accordance with Section 1202.4.3.1. Foundations adjacent to the crawl space shall be protected from frost assuming that the crawl space temperature is the same as the exterior temperature.
 2. Crawl spaces shall be included within the building thermal envelope and the space mechanically ventilated to the building interior per Section 1202.4.3.2.
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?
The term “extremely cold climate” is undefined in the building code.
2. Why is the proposed code change a reasonable solution?
Climate Zone 7 is termed by the energy code as “very cold”. The next climate zone north is considered “sub arctic”. It is reasonable to interpret that “very cold” is extreme and in effort to provide uniformity for ventilation requirements, it is reasonable to treat Climate Zone 6 “Cold” and Climate Zone 7 “Very Cold” as the same.
3. What other considerations should the TAG consider?
Minnesota Energy Code

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
No. The requirements are already in place but the code section needs clarification to establish the parameters of each ventilation option.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. 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? 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, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.

2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?

None

3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?

No

4. 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.

The proposed change is the lowest impact option with the potential to produce desired results.

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?

None.

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

Continued construction of underfloor crawl spaces that are poorly insulated, under ventilated, and contributors to poor indoor air quality.

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

No

8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

***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: Greg Metz

Date: 8/30/2022

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 1204.1 Lighting- General

Code or rule section to be changed: MR 1305

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).

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.
IBC 1204.1 General

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 ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

1204.1 General: Every space intended for human occupancy shall be provided with natural light by means of exterior glazed openings in accordance with Section 1204.2 or shall be provided with artificial light in accordance with Section 1204.3. Exterior glazed openings shall open directly onto a *public way* or onto a *yard* or *court* in accordance with Section 1205. All dwelling units shall have not less than one habitable space that complies with the requirements of Section 1204.2 Natural light.

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?
There is currently no requirement that a person's dwelling must be provided with any windows at all. Since the code is a minimum standard, at least one space with windows should be included in that standard for a person's dwelling. The minimum standard becomes the bottom threshold for the very poor.
2. Why is the proposed code change a reasonable solution?
Minnesota has long periods with very little daylight. Requiring that the minimum standard for someone's home includes at least one space with a window meeting minimum requirements is reasonable. It is not unreasonable that even the poorest of the poor among us would have some access to daylight in one of their living spaces.
3. What other considerations should the TAG consider?
Minimum natural ventilation requirements for not less than one space within a dwelling.
MBC 1202.1 General Ventilation.

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
No. Most construction today already includes this because the housing market demands it, but as housing becomes more expensive and scarce, the minimum standards for reasonable habitation will become more critical.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. 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? 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, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.

2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?

None

3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?

No

4. 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.

The proposed change is the lowest impact option with the potential to produce desired results.

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?

None.

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

In effort to provide housing at what is perceived as affordable cost, the minimum standards will be pushed to their limits and housing will be constructed with minimal to no windows.

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

No

8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

***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: Greg Metz

Date: 7/27/2022

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 1208.4 Equipment and service pits

Code or rule section to be changed: MR 1305

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).

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.
MBC 1208.4 Equipment and service pits

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 ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

2024 IBC

1209.4 Equipment and service pits. A permanent stair shall be provided to access equipment pits and service pits. The permanent stair shall, at a minimum, meeting the following:

1. The stair shall be installed at an angle of not more than 60 degrees measured from the horizontal plane.
2. The stair shall have flat treads at least 6 inches (152mm) deep and a clear width of at least 18 inches (457 mm) with equally spaced risers at least 10.5 inches (267 mm) high and not exceeding 14 inches (356 mm).
3. The stair shall have intermediate landings not exceeding 18 feet (5.5 m) vertically.
4. Continuous handrails shall be installed on both sides of the stair.
5. The clear distance above the tread nosings shall not be less than 80 inches (2032 mm).

Exception: Elevator pits.

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?

Currently access to equipment platforms is addressed for gaining access to elevated equipment, but no guidance is provided for depressed areas. Access to pits for vehicle maintenance and pits for mechanical or electrical equipment are not addressed.

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

This code section clarifies that a stair compliant with building code section 1012 is not necessary, but access to service locations and equipment located in pits can be safely gained via the same type of ship's ladder as elevated platforms.

3. What other considerations should the TAG consider?

None

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.

The proposed will decrease construction costs by allowing less expensive and space intensive stair construction.

2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.

The cost is readily offset by the assurance that fire walls are constructed correctly and reviewed by a third-party.

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

No

4. 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? 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, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No
4. 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.

The proposed change is the lowest impact option with the potential to produce desired results.

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Non-uniformity in code application and undue expense when standard stairs are required into pits.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

***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: Greg Metz

Date: 8/30/2022

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 1502.3 Scuppers

Code or rule section to be changed: MR 1305

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).

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
1502.3 Scuppers

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.

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 ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

2020 MSBC and 2024 IBC deleted this section.

1502.3 Scuppers. Deleted. The quantity, size, location and inlet elevation of the scuppers shall be sized to prevent the depth of ponding water from exceeding the structural design capacity of the roof as determined by Section 1611.1. Scuppers shall be sized in accordance with Table 1502.2.3. Scuppers shall not have an opening weir width of less than 4 inches (102 mm). The flow through the primary roof drainage system, including flow through primary drainage scuppers, shall not be considered when locating and sizing secondary (emergency) scuppers. Scuppers shall not discharge onto public sidewalks or sidewalks used as a part of the means of egress.

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?
The model building code previously correctly included scuppers within the scoping, Minnesota has also previously deleted it out. Minnesota needs to include scuppers as part of the building code design criteria so that they get sized correctly.
2. Why is the proposed code change a reasonable solution?
Secondary drainage systems are required to equal the capacity of primary drainage systems. Minnesota includes a sizing table for emergency overflow scuppers that matches the drainage requirements in the plumbing code. It is reasonable to refer to the same table in order to properly size scuppers that are used as the primary drainage system.
3. What other considerations should the TAG consider?
Minnesota plumbing code coordination.

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
No. The requirements are already in place but the code section needs clarification to establish the parameters scupper sizing for both primary drainage scuppers as well as emergency overflow scuppers.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. 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? 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, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.

2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?

None

3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?

No

4. 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.

The proposed change is the lowest impact option with the potential to produce desired results.

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?

None.

6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?

Continued confusion over how to properly size scuppers used as the primary system for roof drainage. Continued confusion if a secondary drainage system is required if scuppers are used as the primary drainage system.

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

No

8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

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CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Greg Metz

Date: 7/26/2022

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 1705.19 Special inspections of fire walls

Code or rule section to be changed: MR 1305

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).

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.
MBC 1705.19 Special Inspections of Fire Walls

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 ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

1705.21 Special inspections of fire walls. For the fire resistance systems of fire walls, periodic special inspections shall be required for the following:

- a. fastening of fire resistance rated panel systems to substrates.
- b. installation of fire-resistance-rated joint systems.
- c. Installation of fire and smoke damper systems
- d. verification of structural independence on each side of the fire wall.
- e. visual inspection that there are no unprotected openings in the fire wall.

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?
Fire walls are complex and highly detailed building elements. Building inspectors cannot be present for each part of the firewall construction to verify conformance for this critical part of passive fire protection.
2. Why is the proposed code change a reasonable solution?
Buildings large enough to have fire walls also typically have a special inspections program for other building components. Adding periodic inspections for these critical components will help ensure that this critical fire protection element is constructed correctly.
3. What other considerations should the TAG consider?
None

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
The proposed will increase construction costs by adding special inspections to larger buildings that have fire walls.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
The cost is readily offset by the assurance that fire walls are constructed correctly and reviewed by a third-party.
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. 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? 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, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners of buildings large enough to require a fire wall.

2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?

None

3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?

No

4. 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.

The proposed change is the lowest impact option with the potential to produce desired results.

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?

None.

6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?

Continued spot inspection of fire walls at or near completion where most of the critical work is covered or concealed.

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

No

8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

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CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Greg Metz

Date: 8/30/2022

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

1805.1.3 Ground water control

Code or rule section to be changed: MR 1305

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).

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.
IBC 1805.1.3 Ground water control

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 ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

1805.1.3 Ground water control. Where the ground water table is lowered and maintained at an elevation not less than 6 inches (152 mm) below the bottom of the lowest floor by means which do not include the use of pumps, electricity or fossil fuels, the floor and walls shall be dampproofed in accordance with Section 1805.2. The design of the system to lower the ground water table shall be based on accepted principals of engineering that shall consider, but not necessarily be limited to, permeability of the soil, rate at which the water enters the drainage system, rated capacity of ~~pumps~~ drainage system, ~~head against which pumps are to operate~~ and the rated capacity of the disposal area of the system.

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.

Yes, Section 1805.3 Waterproofing

Need and Reason

1. Why is the proposed code change needed?

Minnesota Statute 103G.271 limits the amount of ground water that can be removed and discharged to 1,000,000 gallons/year which equates to approximately 2,700 gallons of water per day.

Dewatering a building excavation and mandating continuous use of energy for pumping in order to defray the cost of waterproofing is counter to energy conservation measures sought by the state.

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

New construction below the water table should be waterproofed and not rely on pumping groundwater to keep below grade spaces dry. If the power should fail, lower-level spaces would flood.

Minnesota Rule 1335 no longer allows pumping for spaces below grade located in areas susceptible to flooding which may not have a high-water table and only require pumping seasonally. It is not reasonable to allow buildings to continually pump ground water to keep spaces dry when other buildings which only require periodic pumping are not permitted to do so because of the risk of power outage.

3. What other considerations should the TAG consider?

Minnesota statutes and regulations against pumping and dumping groundwater for other purposes. Sustainability and resiliency concerns for long term impact of building viability. The code does not require that the pumps have any sort of back-up power, so spaces located below the water table will flood if there is a power outage.

If this proposal is rejected, consider adding to this section a reference to Minnesota Statute 103G.271 for "Appropriation and use of waters."

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.

Yes, the proposed change will increase construction costs for buildings designed with spaces located below the ground water table. Spaces located below the water table will be required to be waterproofed rather than dampproofed. Waterproofing is more expensive

than dampproofing. Some of the cost will be deferred by eliminating the need for a building drainage system, ground water pumps and the power system infrastructure to support them.

2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
Yes. Spaces constructed below the water table will not be at risk of flood during a power failure. Flooding is detrimental to most standard building materials and the moisture associated with flooding and dampness fosters microbial growth which adversely affects indoor air quality. Requiring waterproofing in lieu of allowing pumping when spaces are located below the water table will save energy associated with pumping, save groundwater resources by allowing groundwater to stay in place, and maintain the capacity of stormwater management systems which are typically used to dump groundwater.
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. 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? 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, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No
4. 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.

The proposed change is the lowest impact option with the potential to produce desired results.

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Construction of buildings seemingly allowed to build to any depth below the water table and pump groundwater in lieu of providing waterproofing and potentially inadvertently violating Minnesota Statute 103G.271 which limits the amount of groundwater that can be pumped.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.

No

8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.
Change in this rule will support compliance with Minnesota Statute 103G.271 which regulates pumping of groundwater.

***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: 6/13/24 Revised 7/8/24 9/19/24

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

Model Code: 2024 IBC

Telephone number: 612-246-7303

Code or Rule Section: 1809.5

Firm/Association affiliation, if any: City of Minneapolis

Topic of proposal: 1809.5

Code or rule section to be changed: 1809.5

Intended for Technical Advisory Group ("TAG"):

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). 1809.5
- 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.
1809.5

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.

2020 MSBC

1809.5 Frost protection.

Except where otherwise protected from frost, foundations and other permanent supports of *buildings* and *structures* shall be protected from frost by one or more of the following methods:

1. ~~Extending below the frost line of the locality.~~ Constructed in accordance with 1303.1600.
2. Constructing in accordance with ASCE 32.
3. Erecting on solid rock.

~~**Exception:** Freestanding buildings constructed in accordance with Minnesota Rules, Chapter 1303, shall not be required to be protected.~~

Exception: Free-standing *buildings* meeting all of the following conditions shall not be required to be protected:

1. ~~Assigned to Risk Category I.~~ Classified as group U occupancy
2. Area of ~~600~~ 1,000 square feet (56 m²) or less for *light-frame construction* or 400 square feet (37 m²) or less for other than *light-frame construction*.
3. Eave height of 10 feet (3048 mm) or less.

Shallow foundation shall not bear on frozen soil unless such frozen condition is of a permanent character.

103.1600 subp 2

~~**Exception:** Slab on grade construction may be placed on any soil except peat or muck for detached one-story private garage, carport, and shed buildings not larger than 1,000 square feet (92.9 m²).~~

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.)

The Mn amendment referencing to chapter 1303 should be deleted.

The model code language provides more clear language and addresses more options. There is a reference in 1300.1600 to soils under slab on grade buildings that I believe is intended to address a size limit for these structures so I have modified the model code language to match up with the current Mn allowance of 1,000 s.f. but only for light frame construction.

2. Why is the proposed code change a reasonable solution?
It addresses a life safety issue unique to cold weather climates.

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. Structures are required to have foundations. A stoop or landing is a structure per the IBC definition.

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?

Egress doors could become unusable during cold weather conditions thus trapping people inside a structure.

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 considered by the TAG.



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: C. Scott Anderson

Date: 6/13/24 Revised 7/8/24 9/19/24

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

Model Code: 2024 IBC

Telephone number: 612-246-7303

Code or Rule Section: 1809.5.1 + 1010.1.5

Firm/Association affiliation, if any: City of Minneapolis

Topic of proposal: 1809.5.1 + 1010.1.5

Code or rule section to be changed: 1809.5.1 + 1010.1.5

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 checked="" type="checkbox"/> | <input 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). 1809.5.1
- 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. 1809.5.1 + 1010.1.5

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 ~~strike through~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

1809.5.1 Frost protection at ~~required exits.~~ exterior landings

Frost protection shall be provided at exterior landings for all ~~required~~ exterior doors used for egress purposes ~~exits with outward-swinging doors. Frost protection shall only be required to the extent necessary to ensure the unobstructed opening of the required exit doors.~~

Add new section

1010.1.5.1 Landings at Exterior Exit Doors

Frost protection in accordance with 1809.5 shall be provided at exterior landings for at all exterior doors used for egress purposes with outward swinging doors.

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 1809.5.1 is relocated to 1010.5 as it is addressing landings and it is more likely that this requirement will be identified here than in the foundations section.

The word "required" has been removed because all exit doors need to be safe. Section 1010.1 requires that all doors provided for egress purposes in excess of those required for egress are required to meet the requirements of chapter 10. Therefore frost protection should also be extended to all doors provided for egress purposes.

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

It addresses a life safety issue unique to cold weather climates.

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. Structures are required to have foundations. A stoop or landing is a structure per the IBC definition.

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?
Egress doors could become unusable during cold weather conditions thus trapping people inside a structure.
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: Greg Metz

Date: 9/1/2022

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 2603.5 Exterior walls of buildings of any height; and

Code or rule section to be changed: MR 1305

MBC 2603.5.8 Exterior walls with additional façade safety features

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 checked="" type="checkbox"/> | <input 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).

- 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.
 IBC 2603.5 Exterior walls of buildings of any height; Add Subsection 2603.5.8

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 ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

2603.5 Exterior walls of buildings of any height. *Exterior walls* of buildings of Type I, II, III, or IV construction of any height shall comply with Sections 2305.1 through 2305.7. *Exterior walls* of cold storage *buildings* required to be constructed of noncombustible materials, where the *building* is more than one *story* in height, shall comply with the provisions of Sections 2603.5.1 through 2603.5.7. *Exterior walls of buildings* of Type V construction shall comply with Sections 2603.2, 2603.3 and 2603.4. *Fire blocking* shall be in accordance with Section 718.2.

Exception: Buildings of Type II, III, or IV construction where the exterior wall height does not exceed 70 feet in height above the level of fire department access, and where the exterior walls comply with Sections 2603.5.1, 2603.5.2, 2603.5.4, 2603.5.6, 2603.5.7, and 2603.5.8.

2603.5.8 Exterior walls with additional façade safety features. Exterior walls with additional façade safety features shall include the following:

1. The building is equipped with an automatic sprinkler system per Section 903.3.1.1, and fire flow analysis has been performed without sprinkler decrease allowance that shows adequate water is available.
 2. There is not less than 30 feet (9144 mm) of clear yard space on each side of the building that will allow fire fighter access to the exterior walls.
 3. A fire department access lane compliant with Minnesota Fire Code Section 503 is located within 150 feet (45270 mm) of any façade location requiring additional façade safety features.
 4. Exterior walls in which concealed spaces contain combustible components are provided with Fireblocking in such a manner so as to interrupt and cut off concealed air spaces (both vertical and horizontal)
 - a. Fireblocking shall be installed within concealed spaces of exterior wall assemblies at every floor level or at maximum vertical intervals not exceeding 20 feet. Fireblocking shall be installed at horizontal intervals not exceeding 40 feet in exterior walls of noncombustible construction.
 - b. Materials used for Fireblocking in exterior wall assemblies shall comply with Section 7.18.2.1.
 5. Exterior walls containing foam plastic insulation are not designed with horizontal projections or elements that would block a fire hose stream from the ground unless the projections are provided with frost protected exterior sprinkler coverage above the projection.
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?
The Minnesota energy code is increasingly requiring exterior continuous insulation and the most economical insulation for this function is foam plastic. The current code is written as all-or-nothing for buildings of any height over one story for Construction Types I, II, III and IV. Yet, Construction Type VA will allow exterior facades with foam plastics up to 70 feet in height without restrictive testing if the building is fully sprinkled.
2. Why is the proposed code change a reasonable solution?
It allows the same type of foam plastic exterior insulation up to the same height as Type V-A construction provided that the building is fully sprinkled on the interior to mitigate fire

propagation through windows to the exterior facades, that fire blocking is provided at intervals to inhibit façade fire propagation, and to ensure fire department access to all facades with foam plastics.

3. What other considerations should the TAG consider?

The need for an NFPA 285 test for every variant of a wall assembly for exterior facades given restrictions in height to that which is allowed for Type VA construction without NFPA 285 testing.

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.

The proposed change will decrease construction costs because foam plastic insulation is less expensive than mineral wool insulation of equivalent insulating properties. These are the two primary insulations available for continuous exterior insulation.

2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.

N/A

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

No

4. 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? 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, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.

2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?

None

3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?

No

4. 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.

The proposed change is the lowest impact option with the potential to produce desired results.

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?

None.

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

Continued avoidance of continuous exterior insulation in commercial construction resulting in continued significant energy consumption in new buildings.

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

No

8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

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