



## CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Greg Metz

Date: 1/25/2023

Revised 4/30/2024

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

Model Code: IEBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IEBC 307.1 Sounders

Code or rule section to be changed: MR 1311

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### General Information

**Yes**    **No**

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

### Proposed Language

1. The proposed code change is meant to:

- change language contained the model code book? If so, list section(s).
- 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.  
Add fire alarm sounders in dwelling and sleeping units

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.

~~**502.6 Smoke alarms in existing portions of a building.** Where an addition is made to a building or structure of a Group R or I-1 occupancy, the existing building shall be provided with smoke alarms in accordance with the Minnesota Building Code, Chapter 1305.~~

~~**307.1 Smoke alarms.** Where an addition, alteration, change of occupancy or relocation of a building is made to an existing building, the existing building shall be provided with carbon monoxide detection in accordance with the International Fire Code or Section 310 of the international Residential Code.~~

**307.1 Fire Detection Systems in existing buildings.** Where an addition, alteration, change of occupancy or relocation of a building is made to an existing building, the existing building shall comply with Sections 307.1.1 and 307.1.2.

**Exception:** Work classified as Level 1 Alterations in accordance with Chapter 7.

**307.1.1 Smoke alarms.** Smoke alarms shall be provided in accordance with Minnesota Building Code Chapter 1305.

**307.1.2 Fire alarms.** Annunciators within dwelling units and sleeping units for building fire alarm systems shall be provided in accordance with Minnesota Fire Code Chapter 7511, Section 1107.

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 Prescriptive Method requires in-unit smoke detection but does not require fire alarm annunciation within dwelling units if there is a building fire.
2. Why is the proposed code change a reasonable solution?  
If there is a building fire, it is critical that residents are aware of the emergency, especially when sleeping. Annunciators within the dwelling unit/sleeping unit will provide that early warning notification of an emergency so that people can take appropriate action. The fire code already requires the annunciators, so including the requirement in the building code will allow incorporation into the original design.
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 increase because the requirement is already in the fire code. May actually be a net decrease in construction costs because the designers will be aware of the requirement before the building is completed.
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?  
If this amendment is not included, then annunciators will still be required by the fire code after the building certificate of occupancy is issued, but the cost to install them will be greater when installed into an already completed building.
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:* 9/8/2022

*Revised:* 4/30/2024

*Revised:* 6/7/2024

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

*Model Code:* IEBC 2024

*Telephone number:* 651-284-5884

*Code or Rule Section:*

*Firm/Association affiliation, if any:* DLI/CCLD

IEBC 310 Energy Conservation

*Code or rule section to be changed:* MR 1311

### 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).
  
- 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.  
IEBC 310 Energy Conservation

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.

### **310 Energy Conservation**

**310.1 Additions, Alterations, or relocations.** ~~New construction and~~ Additions, alterations, reconstruction due to substantial damage, substantial improvements, or substantial energy improvements to existing buildings shall comply with Minnesota Rule 1322 Minnesota Residential Energy Code or Minnesota Rule 1323 Minnesota Energy Code as applicable.

**Exception:** Work classified as Level 1 Alterations in accordance with Chapter 7.

**310.2 Change of use to higher energy intensity.** Buildings undergoing a change of use to a ~~lower~~ higher *Building Activity Site Energy Target* in accordance with Table 306.2 shall comply with the Minnesota Rule Chapter 1323 Minnesota Energy Code to the greatest extent technically feasible.

Table 310.2 Energy Activity Site Energy Target

| Building Type                    | Climate Zone |     |
|----------------------------------|--------------|-----|
|                                  | 6A           | 7   |
| Fast food                        | 364          | 393 |
| Laboratory                       | 232          | 249 |
| Restaurant/cafeteria             | 195          | 213 |
| Convenience store                | 193          | 208 |
| Grocery/food market              | 161          | 174 |
| Convenience store with gas       | 156          | 168 |
| Hospital/inpatient health        | 142          | 144 |
| Nursing home/assisted living     | 109          | 118 |
| Other food service               | 107          | 116 |
| Strip shopping mall              | 94           | 106 |
| Enclosed mall                    | 90           | 101 |
| Apartment (in 2-4 unit building) | 89           | 101 |
| College/university               | 90           | 99  |
| Refrigerated warehouse           | 90           | 96  |
| Fire/police station              | 85           | 92  |
| Vehicular dealership/showroom    | 78           | 87  |
| Library                          | 80           | 86  |
| Other retail                     | 78           | 86  |
| Dormitory/fraternity/sorority    | 75           | 85  |
| Other public order and safety    | 78           | 84  |
| Other service                    | 78           | 84  |
| Bank/other financial             | 76           | 82  |
| Mobile/manufactured home         | 71           | 80  |
| Government office                | 67           | 72  |
| High school                      | 66           | 72  |
| Single-family Attached           | 60           | 69  |
| Apartment (in 5+ unit building)  | 60           | 68  |

|                                |    |    |
|--------------------------------|----|----|
| Mixed use/office               | 62 | 67 |
| Hotel                          | 61 | 65 |
| Preschool/daycare              | 60 | 63 |
| Distribution/shipping center   | 49 | 60 |
| Post office/postal center      | 56 | 60 |
| Single-family Detached         | 52 | 60 |
| Admin/professional office      | 54 | 58 |
| Motel or inn                   | 56 | 57 |
| Other office                   | 52 | 56 |
| Other lodging                  | 53 | 55 |
| Other food sales               | 49 | 53 |
| Retail store                   | 45 | 50 |
| Medical office (nondiagnostic) | 46 | 49 |
| Elementary/middle school       | 46 | 49 |
| Clinic/other outpatient health | 47 | 46 |
| Vehicle service/repair shop    | 43 | 46 |
| Other classroom education      | 37 | 40 |
| Repair shop                    | 37 | 40 |
| Social/meeting                 | 36 | 39 |
| Other public assembly          | 37 | 39 |
| Recreation                     | 34 | 37 |
| Religious worship              | 30 | 33 |
| Entertainment/culture          | 30 | 32 |
| Medical office (diagnostic)    | 31 | 31 |
| Nonrefrigerated warehouse      | 24 | 29 |
| Vehicle storage/maintenance    | 19 | 20 |

Table based on ASHRAE 100 Standard, Table 7-2A.

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 conservation code for existing buildings makes no direct reference to energy code compliance. Inclusion in the code path scoping ensures that the energy codes are considered when designing and evaluating buildings.

Minnesota Rule 1323, Subd. 4 requires compliance with the current energy code when there is an increase in demand for either fossil fuel or electricity, but there is currently no standard for comparison. When a change in use results in an increase in energy demand, it is often technically or financially infeasible to comply with all of the current energy code requirements, so the requirement is frequently overlooked and opportunity for improvement missed.

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

The first part provides clear scoping to the energy codes for alterations and new work.

The second part provides clarity for when the building energy use needs to be addressed due to a change in building use and provides a flexible performance method for

demonstrating compliance. The performance method recognizes the difficulty for existing buildings to comply with all of the current energy code compliance requirements.

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. The requirements are already in code. The proposed code change simply clarifies the conditions under which the code must be applied.
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 disregard for energy code compliance for alterations work affecting the building thermal envelope, one-for-one changing of equipment, etc.

Continued disregard for requiring energy code improvements to existing buildings when there is a change in use to a higher energy intensity level.

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:* IEBC 2024

*Telephone number:* 651-284-5884

*Code or Rule Section:*

*Firm/Association affiliation, if any:* DLI/CCLD

MCCEB 311 Electric Vehicle Charging Stations

*Code or rule section to be changed:* MR 1311

### 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 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.  
MCCEB 306 Electric Vehicle Charging Stations

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.

### **Add Section 311 Electric vehicle charging stations.**

**311.1 Electric vehicle charging stations.** Electric vehicle charging infrastructure shall comply with the Minnesota Building Code under the following conditions:

**311.1.1** Where the work area undergoing alteration, including building additions exceeds 50% of the original building area

**311.1.2** Where more than 10 parking spaces are added or substantially modified.

**Exception:** The number of parking spaces equipped with electric vehicle charging infrastructure need not exceed the number of parking spaces indicated to be added or altered in the scope of work.

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?
  - a. To provide equity in housing for renters who desire to drive electric vehicles.
  - b. To provide equity in employment for employees who desire to drive electric vehicles.
  - c. To promulgate the use of electric vehicles to curb carbon dioxide emissions.
2. Why is the proposed code change a reasonable solution?

It focuses EV charging requirements on locations where longer-term EV charging is likely to take place; at home and at work. Intermittent EV charging is not necessary for people shopping or running errands because vehicle range has increased to the point of allowing most of these short trips to occur without the need to charge a vehicle.
3. What other considerations should the TAG consider?

Quantities of EV spaces for each occupancy group/type.  
Definitions and scoping from the following:  
[Staff-Draft-EV-Infrastructure-Building-Code-Resource\\_071921.docx \(live.com\)](#)

### **Cost/Benefit Analysis**

1. Will the proposed code change increase or decrease costs? Please explain.  
EV Charging stations cost on average \$XXXX/station.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.  
The benefit will be in providing equity to renters for owning electric vehicles and providing zero-carbon options for transportation.
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, commercial residential building owners, owners of buildings with employees, hotel/motel 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 equity disparity between renters and building owners regarding the ability to drive and conveniently charge electric vehicles. Continued and steady increase in transportation carbon emissions from fuel-burning vehicles.
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:* 1/25/2023

*Revised:* 4/30/2024

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

*Model Code:* IEBC 2024

*Telephone number:* 651-284-5884

*Code or Rule Section:*

*Firm/Association affiliation, if any:* DLI/CCLD

IEBC 503.5 Reroofing

*Code or rule section to be changed:* MR 1311

### 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).  
503.5 Seismic Design Category F changed to Reroofing
- 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.

~~**503.5 Seismic Category F.** Where the work area exceeds 50% of the building area, and where the building is assigned to Seismic Category F, the structure of the altered building shall meet the requirements of Sections 1609 and 1613 of the International Building Code. Reduced seismic forces shall be permitted.~~

**503.5 Reroofing.** All new work associated with the recovering or replacing an existing roof or roof covering shall comply with the requirements of Section 705.

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 Prescriptive Method does not directly address roof recovering or roof replacement. Providing this section will clarify the specific scoping for reroofing work.
2. Why is the proposed code change a reasonable solution?  
Eliminating a section on seismic structural design requirements that will never apply to Minnesota and adding in a section for reroofing immediately after structural considerations for alterations places the compliance criteria an a location that is easily found and clarifies the requirements.
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. The amendment clarifies the requirement so that the code path is explicit rather than implied.
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?

If this amendment is not included, then the requirements for reroofing under the prescriptive compliance path are unclear. Section 503.1 could be interpreted to require the reroof or recovering to comply with requirements for new construction rather than the reroofing requirements.

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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Date: 4/30/2024

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

Model Code: IEBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IEBC 311.1

Code or rule section to be changed: MR 1311

### 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"/> |

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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.

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.

**311.1 Elevator hoistway opening protection.** Buildings undergoing additions, alterations, changes of occupancy to a higher fire/life safety/ means of egress hazard level and relocated buildings shall be provided with elevator hoistway opening protection as required in Minnesota Rules Chapter 1305, the Minnesota Building Code.

Exceptions:

1. Historical buildings.
2. Buildings only undergoing repairs or work classified as Level 1 alterations in accordance with Chapter 7.

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?  
Unprotected elevator hoistways have the capacity to quickly propagate fire vertically through a building and contaminate floors above with smoke from a fire compromising the means of egress systems.
2. Why is the proposed code change a reasonable solution?  
Hoistway protection requires a fire partitions or smoke partitions which are easily and readily achievable, providing protection for the existing means of egress system on upper floors which may or may not be compliant with the current building code. Cost is less than \$2000 per opening.
3. What other considerations should the TAG consider?  
None

### **Cost/Benefit Analysis**

1. Will the proposed code change increase or decrease costs? Please explain.  
Minimal increase in construction cost. It will involve at least the addition of a smoke protection door installed over the elevator door opening.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.  
The increased cost will easily be offset by the smoke protection to the means of egress system provided to other stories in the building.
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?  
If this amendment is not included, then buildings will continue to be renovated without adequate protection of the means of egress system from unmitigated smoke propagation migrating from floors below.
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:* 2/1/2023

*Revised:* 4/30/2024

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

*Model Code:* IEBC 2024

*Telephone number:* 651-284-5884

*Code or Rule Section:*

*Firm/Association affiliation, if any:* DLI/CCLD

MCCEB 705.1 General Reroofing

*Code or rule section to be changed:* MR 1311

### 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).  
705.1 General. Exception 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.

**705.1. General.** Materials and methods of application used for recovering or replacing an existing roof covering shall comply with the requirements of Chapter 15 of the International Building code.

**Exceptions:**

1. Roof replacement or roof recover of existing low-slope roof coverings shall not be required to meet the minimum design slope of ¼ unit vertical in 12 units horizontal (2-percent slope) in Section 1507 of the International Building Code for roofs that provide positive drainage ~~and meet the requirements of Sections 1608.3 and 1611.2 of the International Building code~~ if all the following conditions are met:
  1. The minimum required roof slope is technically infeasible due to existing parapet heights, existing unalterable flashing that requires positive drainage, or other obstacle.
  2. The existing structure is demonstrated through structural analysis to be capable of supporting ponding to the level of secondary emergency drainage system or point of overflow.
  3. A secondary (emergency) drainage system is installed in compliance with [Minnesota Rule Chapter 1305, Section 1502.](#)
- ~~2. Recovering or replacing an existing roof covering shall not be required to meet the requirement for secondary (emergency overflow) drains or scuppers in Section 1502 of the International Building Code for roofs that provide for positive roof drainage and meet the requirements of Sections 1608.3 and 1611.2 of the International Building Code. For the purposes of this exception, existing secondary drainage or scupper systems required in accordance with this code shall not be removed unless they are replaced by secondary drains or scuppers designed and installed in accordance with Section 1502 of the International Building Code.~~
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?  
Roofs with potential to pond water are at risk of collapse if the structural capacity of the roof is exceeded when roof drains clog.
2. Why is the proposed code change a reasonable solution?  
The change addresses the immediate concern to life safety under potentially unsafe conditions. The language now matches that of Minnesota Rule Chapter 1305, Section 1511 Reroofing.
3. What other considerations should the TAG consider?  
None

**Cost/Benefit Analysis**

1. Will the proposed code change increase or decrease costs? Please explain.  
There may be a small increase in cost to install scuppers or overflow drains where none exist on buildings and the structural capacity of the roof does not support ponding.

2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.  
There is a danger of roof collapse if the primary roof drainage system becomes clogged, there is no secondary roof drainage system and the roof structure is insufficient to support the ponding loads. Minnesota has seen a number of roof failures under heavy rain and snow loads. With the increase in insulation requirements, snow melt off of the roof is inhibited, increasing the time of load intensity.
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?  
If this amendment is not included, older buildings with roof structures insufficient to support ponding and snow loads are at significant risk of collapse.
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: **4/22/24**

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

Model Code: **2024 IEBC**

Telephone number: **612-246-7303**

Code or Rule Section: **Tables 506.1**

Firm/Association affiliation, if any: **City of Minneapolis**

Topic of proposal: **Change in occupancy hazard categories**

Code or rule section to be changed: **Tables 506.1**

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 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).  
**Table 506.1**
- 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 ~~strikethrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

**TABLE 506.1 LIFE SAFETY AND FIRE RISK**

| <b>RELATIVE HAZARD</b> | <b>OCCUPANCY CLASSIFICATIONS <sup>a</sup></b>      |
|------------------------|--|
| 1 (Highest Hazard)     | H, I-2, I-3  |
| 2                      | A-1, A-2, A-3, A-4                                 |
| 3                      | A-5; E; I-1; R-1; R-2; I-4                         |
| 4                      | R-3; R-4, M  |
| 5                      | B; F-1, S-1, <del>IRC-1</del> , <u>IRC-2</u> IRC-3 |
| 6                      | F-2; S-2, <del>IRC-2</del> <u>IRC-1</u> ,          |
| 7 (Lowest Hazard)      | U, IRC-4   |

a. IRC-1, IRC-2 IRC-3 + IRC-4 occupancy classifications are included only to determine relative hazard level where residential structures are converted to nonresidential uses in a change of occupancy. See part 1300.0070, subpart 12b, for occupancy classifications.

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 relocates IRC -1 to risk category 6 and IRC-2 to risk category 5

This more appropriately aligns the risk categories of IRC occupancies.

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

This will more accurately align the relative hazards of these structures

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 inaccurate classification of risk.

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

no

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



## CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

*Author/requestor:* C. Scott Anderson

*Date:* 4/22/24

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

*Model Code:* 2024 IEBC

*Telephone number:* 612-246-7303

*Code or Rule Section:* Tables 1011.5  
1011.6 + 1011.7

*Firm/Association affiliation, if any:* City of Minneapolis

*Topic of proposal:* Change in occupancy  
hazard categories

*Code or rule section to be changed:* Tables 1011.5, 1011.6 + 1011.7

*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.  
Tables 1011.5, 1011.6 + 1011.7

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.

**TABLE 1011.5 MEANS OF EGRESS HAZARD CATEGORIES**

| RELATIVE HAZARD    | OCCUPANCY CLASSIFICATIONS <sup>a</sup>                         |
|--------------------|--|
| 1 (Highest Hazard) | H  |
| 2                  | I-2; I-3; I-4  |
| 3                  | A; E; I-1; M; R-1; R-2; R-4, Condition 2                       |
| 4                  | B; F-1; R-3; R-4, Condition 1; S-1, <u>IRC-1, IRC-2, IRC-3</u> |
| 5 (Lowest Hazard)  | F-2; S-2; U, <u>IRC-4</u>                                      |

a. IRC-1, IRC-2 IRC-3 + IRC-4 occupancy classifications are included only to determine relative hazard level where residential structures are converted to nonresidetntial uses in a change of occupancy. See part 1300.0070, subpart 12b, for occupancy classifications.

**TABLE 1011.6 HEIGHTS AND AREAS HAZARD CATEGORIES**

| RELATIVE HAZARD    | OCCUPANCY CLASSIFICATIONS <sup>a</sup>  |
|--------------------|---|
| 1 (Highest Hazard) | H   |
| 2                  | A-1; A-2; A-3; A-4; I; R-1; R-2; R-4, Condition 2                             |
| 3                  | E; F-1; S-1; M  |
| 4 (Lowest Hazard)  | B; F-2; S-2; A-5; R-3; R-4, Condition 1; U, <u>IRC-1, IRC-2, IRC-3, IRC-4</u> |

a. IRC-1, IRC-2 IRC-3 + IRC-4 occupancy classifications are included only to determine relative hazard level where residential structures are converted to nonresidetntial uses in a change of occupancy. See part 1300.0070, subpart 12b, for occupancy classifications.

**TABLE 1011.7 EXPOSURE OF EXTERIOR WALLS HAZARD CATEGORIES**

| RELATIVE HAZARD    | OCCUPANCY CLASSIFICATION <sup>a</sup>          |
|--------------------|--|
| 1 (Highest Hazard) | H  |
| 2                  | F-1; M; S-1                                    |
| 3                  | A; B; E; I; R                                  |
| 4 (Lowest Hazard)  | F-2; S-2; U, <u>IRC-1, IRC-2, IRC-3, IRC-4</u> |

a. IRC-1, IRC-2 IRC-3 + IRC-4 occupancy classifications are included only to determine relative hazard level where residential structures are converted to nonresidetntial uses in a change of occupancy. See part 1300.0070, subpart 12b, for occupancy classifications.

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 conversion from 1309 construction to 1305 construction is not addressed in these tables so determining what the relative hazards are is difficult. This is even more complicated since 1309 occupancies are included in table 501 and all are of a lower hazard than the 1305 R occupancies.**
2. Why is the proposed code change a reasonable solution?  
**This will reduce confusion as to the relative hazards when converting 1309 to 1305 occupancies**
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.  
**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:* Jerry Backlund

*Date:* 05/23/2024

*Email address:* jbacklund@hastingsmn.gov

*Model Code:* MN Rules 1311 MN CCEB

*Telephone number:* 6515003481

*Code or Rule Section:* 1311.0020 Subp 9

*Firm/Association affiliation, if any:* AMBO

*Topic of proposal:*

*Code or rule section to be changed:* 1311.0020 Subp 9

*Intended for Technical Advisory Group (“TAG”): Chapter 1311 MN Conservation Code for Existing Buildings*

### 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).  
1311.0020 Subp. 9

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).  
1311.0020 Subp. 9

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

**1311.0020 REFERENCES TO OTHER INTERNATIONAL CODE COUNCIL CODES**

**Subp. 9 Residential Code.** References to the “residential code” or the “International Residential Code” ~~do not apply and are deleted.~~ ,”IRC” in this code refer to Minnesota Rules Chapter 1309

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 MN Chapter 1309 of the 2024 Model code Chapter 3 Building planning

**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 struck out language in the 2020 MN CCEB created issues as other references else where that mention the International Residential Code were not amended and therefore created orphan code language
2. Why is the proposed code change a reasonable solution?  
Provides clarity by not having orphan language. Ties the IRC and the MN CCEB together better as the CCEB is also helpful for the older housing stock.
3. What other factors should the TAG consider?

**Cost/Benefit Analysis**

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.  
No Change
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.  
No cost change
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.  
No increase costs
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 change in cost.

## **Regulatory Analysis**

1. What parties or segments of industry are affected by this proposed code change?  
Builders and remodelers
  
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?  
Confusion. The CCEB when used can help to lower costs
  
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 A Talbot

Date: 5/21/2024

Email address: [talbo047@umn.edu](mailto:talbo047@umn.edu)

Telephone number: 612-626-2783

Model Code: 2024 IEBC (proposed 2024 Minnesota Conservation Code for Existing Buildings)

Code or Rule Section: 1311.0020

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

Topic of proposal: Reference to applicable of Minnesota Fire Code Rules 7511

Code or rule section to be changed: Rule.

Intended for Technical Advisory Group (“TAG”): 1311/2024 IEBC Changes Technical Advisory Group

**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 type="checkbox"/>            | <input checked="" 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).  
NO

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

1311.0020 REFERENCES TO OTHER INTERNATIONAL CODE COUNCIL CODES.

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

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



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

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

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.

1311.0020 REFERENCES TO OTHER INTERNATIONAL CODE COUNCIL CODES. Subp. 3

Fire code References to the "*International Fire Code*" ~~do not apply and are deleted.~~

*References to International Fire Code or IFC in this code mean the Minnesota State Fire Code, Minnesota Rules, Chapter 7511, and adopted pursuant to Minnesota Statutes, Section 326B.02.*

References to the "International Fire Code" in this code mean the Minnesota State Fire Code, Minnesota Rules, Chapter 7511, and adopted pursuant to Minnesota Statutes, Section 326B.02.

3. 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.)

Reference is needed for the Minnesota Fire Code, Chapter 7511 because the fire code is mentioned periodically throughout the IEBC (MN Conservation Code for Existing Buildings).

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

The MN Conservation Code for Existing Buildings cannot be effectively administered without the ability to utilize the Minnesota Fire Code when necessary.

3. What other factors should the TAG consider?  
NONE

### **Cost/Benefit Analysis**

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.  
NO

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.  
NO

### **Regulatory Analysis**

1. What parties or segments of industry are affected by this proposed code change?  
Building Departments, Fire Department, DLI, Minnesota State Fire Code, & Design Professionals
2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.  
NO
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?

### **Deleting the Minnesota State Fire makes administrating**

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.

