

## CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

*Author/requestor:* Greg Metz

*Date:* 1/25/2023

**Revised 4/30/2024**

**Revised 7/2/2024**

*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

### 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 [11071103](#).

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

*Revised:* 7/2/2024

*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, new work constituting alterations, reconstruction due to substantial damage, substantial improvements, or substantial energy improvements, and Level 3 Alterations~~ 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.

\*\*\*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:* 2/1/2023

*Revised:* 4/30/2024

[Revised: 7/2/2024](#)

*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 [705.1-310.1](#) 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.

**705310.1. 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:* Stephen Ubl

*Date:* 11/26/2024

*Email address:* stephen.ubl@ci.stpaul.mn.us

*Model Code:* 2020 MN IEBC

*Telephone number:* 651-266-9021

*Code or Rule Section:* 804.5.1.1

*Firm/Association affiliation, if any:* City of Saint Paul

*Topic of proposal:* Single Exit

*Code or rule section to be changed:* 804.5.1.1

*Intended for Technical Advisory Group (“TAG”):* 1311 Conservation Code

### 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).  
1311 – 2020 Minnesota Conservation Code for Existing Buildings

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 – DLI is charged to have a “Study” completed to assess the single-stair provision and submit a proposal.

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.
- 804.5.1.1 Single-exit buildings.** A single exit or access to a single exit shall be permitted from spaces, ~~any story or~~ below the fourth floor ~~any occupiable roof~~ where one of the following conditions exists:
1. The occupant load, number of dwelling units and exit access travel distance do not exceed the values in **Table 804.5.1.1(1) or 804.5.1.1(2)**.
  2. In Group R-1 or R-2, buildings without an *approved* automatic sprinkler system, individual single-story or multiple-story dwelling or sleeping units shall be permitted to have a single exit or access to a single exit from the dwelling or sleeping unit provided one of the following criteria are met:
    - 2.1. The occupant load is not greater than 10 and the exit access travel distance within the unit does not exceed 75 feet (22 860 mm).
    - 2.2. The building is not more than three stories in height; all third-story space is part of dwelling with an exit access doorway on the second story; and the portion of the exit access travel distance from the door to any habitable room within any such unit to the unit entrance doors does not exceed 50 feet (15 240 mm).
  - ~~3. In buildings of Group R-2 occupancy of any number of stories with not more than four dwelling units per floor served by an interior exit stairway; with a smokeproof enclosure in accordance with Sections 909.20 and 1023.12 of the International Building Code or an exterior stairway as an exit; and where the portion of the exit access travel distance from the dwelling unit entrance door to the exit is not greater than 20 feet (6096 mm).~~
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.  
I do not believe it would given this is 1311.

### **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.)
  - 1.) There are many code sections developed throughout the codes identifying when a second exit is required. The necessity of a second exit is to provide an additional option for occupants to remove themselves from an incident.
  - 2.) Responders need a second exit to combat an incident and save lives. During an emergency, responders cannot be challenged with occupants escaping down a single exit while the fire fighters are hauling hoses and equipment up the stairs (section 1300.0030 – “provide safety to firefighters and emergency responders during emergency operations”).
  - 3.) Providing just a “smokeproof enclosure” is not an Alternate Method of Equivalency for a second exit
  - 4.) The language conflicts with table 805.3.1.1 (1) and 805.3.1.1(2)
2. Why is the proposed code change a reasonable solution?  
Years of code development for life-safety should not be forgotten.  
Responders and occupants need options during an incident.

3. What other factors should the TAG consider?  
DLI is charged to research this issue (a bill was passed in May of this year)

### **Cost/Benefit Analysis**

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.  
Costs could include a second exit – Estimate could be \$5K per floor . . . ?
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.  
We have too much history with two exits being provided. We have no history of single-exit stair buildings above three stories. It is truly a safety feature needed for occupant and responders.
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.  
Ultimately the consumer.
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.  
See #1 -
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.  
It may, depending on the number of stories.

### **Regulatory Analysis**

1. What parties or segments of industry are affected by this proposed code change?  
Generally, developers, hotel and apartment buildings
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.  
There are several life-safety features for consideration that would increase the cost of construction for a single-stair building which would more than likely make the proposal NOT cost effective;  
Considerations:  
  - Add Smoke Evacuation
  - Add Stair pressurization
  - Add second exterior exit
  - Add “No access to spaces not normally occupied” from the stairway
  - Would Trash Chute design be allowed . . . or required?
3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?



The cost of life to occupants and responders.

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.

New law charging DLI to propose a single-stair building provision.

\*\*\*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.

## CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

<i>Author/requestor:</i> Stephen Ubl	<i>Date:</i> 06/26/2024
<i>Email address:</i> stephen.ubl@ci.stpaul.mn.us	<i>Model Code:</i> 2024 IEBC
<i>Telephone number:</i> 651-266-9021	<i>Code or Rule Section:</i> 1007
<i>Firm/Association affiliation, if any:</i> City of Saint Paul	<i>Topic of proposal:</i> Electrical
<i>Code or rule section to be changed:</i> 1007.2 & 1007.3	
<i>Intended for Technical Advisory Group (“TAG”):</i> IEBC	

**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).  
1311 – 2020 Minnesota Conservation Code for Existing Buildings
  - 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.  
Yes
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.

**1007.02 Unsafe conditions.** Where the occupancy of an existing building or part of an existing building is changed, all unsafe conditions shall be corrected without requiring that all parts of the electrical system comply with NFPA 70.

**1007.3 Electrical Service upgrade.** Where the occupancy of an *existing building* or part of an *existing building* is changed, electrical service shall ~~be upgraded to~~ meet the requirements of NFPA 70 for the new occupancy.

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.

### **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.)  
1007.2 charges that all unsafe conditions be corrected. If 1007.2 is satisfied, then there is no reason to upgrade the electrical service. By removing any unsafe condition, this would also mean that the service would meet the new demand requirements of NFPA 70 for the change of use.
2. Why is the proposed code change a reasonable solution?  
Redundancies – if unsafe conditions are removed, upgrading the service is not needed.
3. What other factors should the TAG consider?  
Cost savings are very significant with this change. Additionally, the demand in today's equipment, appliances, light fixtures, etc., are considerably more efficient than in years past, meaning, the existing services can be adequate for handling the new use.

### **Cost/Benefit Analysis**

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.  
Decrease
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.
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.  
It may require an electrical engineer to assess the electrical service to determine its ability to safely function for the proposed use.

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.

## **Regulatory Analysis**

1. What parties or segments of industry are affected by this proposed code change?
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.  
Generally, a review of the existing service by a professional engineer would be acceptable to an AHJ. If the report submitted states that there are no unsafe conditions and the service can handle the proposed demand of the new use, it would then be reasonable to accept the service without replacing it.
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?  
Replacing a safe and acceptable service could add tens of thousands of dollars to a project. The current code is a minimum code and requiring an upgraded service when there are no unsafe conditions found seems quite unreasonable.
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.

## CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

*Author/requestor:* Greg Metz

*Date:* 4/30/2024

[Revised 7/2/2024](#)

*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"/> |

### 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.

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, stories where more than 50% of the story is undergoing alterations, and relocated buildings shall be provided with elevator hoistway opening protection as required in Minnesota Rules Chapter 1305, the Minnesota Building Code on the stories affected by the additions, alterations, or changes of occupancy.

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 considered by the TAG.

## CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

*Author/requestor:* Greg Metz

*Date:* 7/26/2022

Revised 7/2/2024

*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 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 Level 2 alteration and/or any new building additions exceeds 50% of the building area

311.1.2 Where more than 10 parking spaces are added.

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

311.1.3 Where a building is undergoing an alteration or change of occupancy that adds dwelling units to an existing building.

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 \$2,500/station. A load management device to allow sharing of service loading without requiring upsizing of the current electrical system costs approximately \$850 per charging 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 workers and 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, building owners undertaking substantial renovations or changing occupancy to housing from another use.
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.

\*\*\*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:* Lisa Consie

*Date:* 06/26/2024

*Email address:* Lconsie@duluthmn.gov

*Model Code:* 2024 IEBC & 2024 IFC

*Telephone number:* 218-730-4398

*Code or Rule Section:* IEBC 804.8

*Firm/Association affiliation, if any:* FMAM

*Topic of proposal:* Dead-End Corridors

*Code or rule section to be changed:* IEBC 804.8 Dead-End Corridors

*Intended for Technical Advisory Group ("TAG"):* 1311 IEBC

**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 in the model code book? If so, list section(s).

Yes, section 804.8 Dead-End Corridors.

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

#### 804.8 Dead-end Corridors.

Dead-end corridors in any work area shall not exceed ~~35 feet (10 670mm). In Group I-2 occupancies, dead-end corridors shall not exceed 30 feet (9144mm).~~ the distance limits provided in Table 1104.18 of the International Fire Code related to Dead-End Limit distances.

#### **Exceptions:**

1. Where dead-end corridors of greater length are permitted by the International Building Code.
  2. ~~In other than Group A, I-2 and H occupancies, the maximum length of an existing dead-end corridor shall be 50 feet (15 240mm) in building equipped throughout with an automatic fire alarm system installed in accordance with the International Building Code.~~
  3. ~~In other than Group A, I-2, and H occupancies, the maximum length of an existing dead-end corridor shall be 70 feet (21 356mm) in building equipped throughout with an automatic sprinkler system installed in accordance with the International Building Code.~~
  4. ~~In other than Group A, I-2 and H occupancies, the maximum length of an existing, newly constructed, or extended dead-end corridor shall not exceed 50 feet (15 240mm) on floors equipped with an automatic sprinkler system installed in accordance with 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, there is no direct impact to another model code. This code change will match the IFC requirements and provide more consistent code enforcement between the two model codes.

### **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 IFC chapter 11, as adopted in MN Rule 7511.1104, and IEBC distance limits for dead end corridors do not currently coincide, which causes confusion and inequality with enforcement of the limit requirements in jurisdictions that have code officials that enforce both codes. An example: when permits are pulled for a level 2 alteration in a jurisdiction and a building official utilizes chapter 8 of the IEBC. The project is approved and completed allowing a 35' dead-end corridor. The fire code official then performs a fire inspection under the Minnesota State Fire Code (MSFC), utilizing chapter 11, and finds the dead-end corridor to be out of compliance with the limits set forth in MN Rule 7511.1104 Table 1104.17.4. The building owner then is required to change the distance of the corridor according to MSFC, which was allowed to exist under IEBC. Generally speaking, when one code conflicts with another code, the more restrictive code is what is applied.

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

The current conflicting codes cause confusion and hardship for existing building owners. Matching the corridor limits would eliminate this confusion and hardship, allowing for both codes to enforce the same limits.

3. What other factors should the TAG consider?

The chart located in IFC 1104.18 has been adopted by MN Amendment (7511.1104) as Table 1104.17.4 for several code cycles.

Dead-end corridors create a collection area for people trying to exit a space, potentially leaving them without an exit in the event of a fire.

The Minnesota State Fire Code (MSFC) is what is used for enforcement of minimum safety requirements in existing buildings through an operational permit process and inspection over the lifetime of the building. MCCEB is only utilized when a renovation or change of use is requested for an existing building.

### **Cost/Benefit Analysis**

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

Possibly increase costs with a renovation of an existing building because they may need to add other means of egress to prevent the dead-end corridor from exceeding the limits required in the IFC.

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.

Yes, providing a shorter distance on a dead-end corridor allows more time for occupants to escape, should they find a corridor does not lead them to an exit and have to turn around to find an alternate way to exit the building.

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

The cost increase would be on the owner of an existing building.

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

No, since the MSFC is what is utilized for enforcement of conditions in existing buildings already and is the more restrictive code.

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 officials, fire code officials, building and fire inspectors, design professionals, property owners and property occupants.

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.

Another suggestion for a change would be to amend the MSFC to refer back to the current dead-end corridor limit values shown in the IEBC. This is not preferred because the more restrictive limits shown in the table of IFC have already been enforced for several code cycles on existing buildings. Accepting greater dead-end corridor limits causes confusion to inspectors, officials, and design professionals.

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?

Costs to existing building owners may be increased if this code change is not adopted because a dead-end corridor may be accepted at the time of remodel and then be non-compliant by a fire inspector shortly after. This would cause the building owner to fix the fire code violation at their own expense. By adopting the code and utilizing the same dead-end corridor limits, this discrepancy and potential incurred costs could be avoided.

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.

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