

**From:** [Jacob Wollensak](#)  
**To:** [RULES, DLI \(DLI\)](#)  
**Cc:** [Minnesota Department of Labor and Industry](#)  
**Subject:** Re: Rulemaking notice: Minnesota Rules part 1305.3114  
**Date:** Monday, September 9, 2024 11:45:13 AM

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To whom it may concern,

I wanted to share some feedback from a municipal client of ours in response to this proposed rule.

There is concern that this will have a negative impact on aesthetics and budgets, especially for public buildings under 4 stories where alternative methods can be used. We have heard that it's typical for owners to service/clean windows twice a year and it has not been an issue in the past. The other concern is this is another unfunded mandate that will make maintenance more costly for public entities. Also, there are concerns regarding Labor and Industry pushing through rules without a public hearing. Thanks.

Sincerely,

**Wold Architects and Engineers**

**Jake Wollensak | AIA**

Associate

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**From:** Minnesota Department of Labor and Industry <[MNDLI@public.govdelivery.com](mailto:MNDLI@public.govdelivery.com)>

**Sent:** Friday, September 6, 2024 8:29 AM

**To:** Jacob Wollensak <[jwollensak@woldae.com](mailto:jwollensak@woldae.com)>

**Subject:** Rulemaking notice: Minnesota Rules part 1305.3114

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## Amendment to rules governing window cleaning safety features

**Minnesota Rules part 1305.3114**

*You are receiving this email because you have registered to receive electronic*

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The Minnesota Department of Labor and Industry intends to adopt expedited permanent rules to amend the requirements for building features and elements in support of safe window cleaning methods.

The following documents related to this rulemaking will be published in the Sept. 9, 2024, edition of the *State Register*:

- Notice of Intent to Adopt Proposed Expedited Permanent Rules Without a Public Hearing
- Proposed rule

The Notice of Intent to Adopt Proposed Expedited Permanent Rules Without a Public Hearing, proposed rules and Proposed Rule Memorandum which provides background information and context for the proposed rule amendments, along with other information about the status of the rulemaking, are [available in the rulemaking docket](#).

The comment period for this rulemaking ends at **4:30 p.m. on Wednesday, Oct. 9, 2024.**

### **For more information**

For more information, send an email message to [dli.rules@state.mn.us](mailto:dli.rules@state.mn.us).

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