

ADVISORY COMMITTEE COMMENT FORM FOR PROPOSED CODE CHANGES

(This form must be submitted electronically)

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1323, CE-7

Proposed Code Change - Language

Please provide your proposed code change in strikeout/underline format. Provide the *specific* language you would like to see changed, with new words underlined and words to be deleted should be ~~stricken~~. Also, state whether the language contained in your proposal is from a code book or from an amendment currently found in Minnesota Rule. (You may provide the language (electronically) on a separate, attached sheet).

Proposed Code Change – Need and Reason

Please provide a thorough explanation of the need for this change and why this proposed code change is a reasonable change. During the rulemaking process, the Agency must defend the need and reasonableness of all its proposed changes. The Agency must submit evidence that it has considered all aspects of the proposal. (You may provide the need and reason (electronically) on a separate attached sheet).

Proposed Code Change – Cost/Benefit Analysis

Please consider whether this proposed code change will increase/decrease costs or indicate that it will not have any cost implications and explain how it will not. If there is an increased cost, will this cost be offset somehow by a life safety or other benefit? If so, please explain. Are there any cost increases/decreases to enforce or comply with this proposed code change? If so, please explain. (You may provide the cost/benefit analysis (electronically) on a separate, attached sheet).

Other Factors to Consider Related to Proposed Code Change

1. Is this proposed code change meant to:
 - change language contained in a published code book? If so, list section(s).
 - change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s). **To proposed section C101.4.3**
 - delete language contained in a published code book? If so, list section(s).
 - delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
 - neither; this language will be new language, not found in the code book or in Minnesota Rule.
2. Is this proposed code change required by a Minnesota Statute or new legislation? If so, please provide the citation to the Statute or legislation. **No**
3. Will this proposed code change impact other sections of a published code book or of an amendment in Minnesota Rule? If so, please list the affected sections or rule parts. **No**
4. Will this proposed code change impact other parts of the Minnesota State Building Code? If so, please list the affected parts of the Minnesota State Building Code. **No**
5. Who are the parties affected or segments of industry affected by this proposed code change? **Architects, building owners, general contractors**
6. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result. **No**
7. Are you aware of any federal requirement or regulation related to this proposed code change? If so, please list the regulation or requirement. **No**

Proposed change to proposed MN Amendments to 1323.0100 section C101.4.3 Additions, alterations, renovations or repairs, Exception clauses:

3. Existing ceiling, wall or floor cavities exposed during construction provided that these cavities are filled with insulation. If insulation, affected assemblies shall comply with IBC (insert here applicable IBC vapor barrier / retarder section) and with IECC C402.4 Air Leakage.

5. Reroofing for roofs where neither the sheathing nor the insulation is exposed. Roofs without insulation in the cavity and where the sheathing or insulation is exposed during reroofing shall be insulated either above or below the sheathing. If insulation, affected assemblies shall comply with IBC (insert here applicable IBC vapor barrier / retarder section) and with IECC C402.4 Air Leakage.

Need:

This language is meant to be a clarification. I believe that the intent of the IECC code language adopted by MN is that if insulation is required to be added to existing wall or roof assemblies because of exposure of sheathing or cavity during alterations, that all provisions of the code must be met regarding these assemblies. However, a reading of the exceptions might lead one to think only about meeting insulation requirements.

Reason:

If vapor permeable cavity insulation is added without controlling interior air leakage into the cavity, mold, rot or corrosion is likely. The same risks apply if a vapor retarder is not present for walls and roofs and if code-compliant ventilation is not present for roofs.

Cost/benefit Analysis:

Since this language is a clarification not an additional requirement, it should be cost-neutral.