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MINNESOTA DEPARTMENT OF LABOR & INDUSTRY

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ADVISORY COMMITTEE COMMENT FORM
FOR PROPOSED CODE CHANGES
(This form must be submitted electronically)

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Firm/Association affiliation, if any: AIA **1323 CE-6A**

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 ~~striken~~. 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 change to proposed MN Amendments to 1323.0100 section C103.2 Information on construction documents: Add the following sentence to the end of the current proposed MN amendment language:

Air sealing details shall clearly delineate the air barrier location and show continuity between roof, wall, foundation, and around frames and sleeves at openings.

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 is has considered all aspects of the proposal. (You may provide the need and reason (electronically) on a separate attached sheet).

Need:
The 2012 IECC does not require air barrier testing for commercial buildings so air barrier performance is dependent solely upon proper design by the architect, proper communication of design intent to the contractor and proper execution by the contractor.

Reason:
The air barrier diagram is a crucial document that is easy to produce but is often not present in construction drawings. It focuses both the architect and contractor on the importance of the air barrier and its continuity. It is my opinion that the likelihood of compliance with the IECC air leakage standard in C402.4.1.2.3 is greatly increased when this diagram is present.

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).

Cost/benefit Analysis:
The additional cost to the architect would be several hundreds of dollars and would be an insignificant percentage of the design fee. In terms of benefits, a 2005 NIST study on commercial buildings concluded that the difference between the average leaky commercial building and one with a readily achievable air barrier would produce savings in HVAC operating costs from 26% to 37% in Minneapolis. This savings would be in addition to that produced by the reduction of moisture damage caused by interior air leakage into wall and roof assemblies.

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 amendment section C103.2**

   ☐ 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**

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**