

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

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1303 - #18

Proposed Code Change - Language

~~**Unconditioned crawl space floors.** Openings around all penetrations through floors that are located above unconditioned crawl spaces shall be caulked or otherwise sealed to prevent air leakage.~~

~~**Unconditioned crawl space access.** Access doors and other openings or penetrations, any of which are located between basements and adjoining unconditioned crawl spaces, shall be closed, gasketed, or otherwise sealed to prevent air leakage.~~

~~**Ventilation.** Vents to the building's exterior shall be installed in unconditioned crawl spaces. Unconditioned crawl spaces shall be provided with vents to the exterior of the building. The minimum net area of ventilation openings shall comply with Section R408.1 of the International Residential Code (IRC).~~

~~**Unconditioned crawl spaces.** All penetrations through floors or walls into unconditioned crawl spaces shall be caulked or sealed. Access doors into unconditioned crawls spaces shall be gasketed. Foundation ventilation shall be provided in accordance with Minnesota Building Code Chapter 1309.~~

Proposed Code Change – Need and Reason

The proposal combines all of the rules for unconditioned crawl spaces into one section. This reduces nine lines of text into three. The brevity of the proposed text accomplishes everything that is intended into three lines. It is direct and understandable. It is necessary to have basic language providing direction so that it will be understood by users of the code. The change corrects a shortcoming in the proposed rule because it will apply to all penetrations of the crawl space, not just those in a floor above (which is an oversight).

Including the language “to prevent air leakage” creates a higher standard of inspection than simply “caulked” and is deleted. It could be interpreted to include some type of testing to prove that no leakage occurs. Realistically, it is not possible given the materials involved for these spaces to prevent all air leakage. It is necessary to delete that language to eliminate unnecessary tests, improve uniformity, and avoid confusion.

This proposal is reasonable because it corrects problems in the draft rules in a succinct, easily understood format.

Proposed Code Change – Cost/Benefit Analysis

This proposal will have no impact on the cost of construction.

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).

Radon rules

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?

Code officials, building designers, contractors, building owners

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