

## ADVISORY COMMITTEE COMMENT FORM FOR PROPOSED CODE CHANGES

(This form must be submitted electronically)

*Author/requestor:* Richard J “Tate” Halvorson

*Email address:* thalvorson@mcgough.com

*Telephone number:* 651-228-6316

*Firm/Association affiliation, if any:* former Building Official, presently working for McGough Const. and City of Minneapolis, Commercial Plan Review

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### **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).

#### **Delete the Exception to IBC Section 1022.5:**

**1022.5 Penetrations.** Penetrations into and openings through *interior exit stairways* and *ramps* are prohibited except for required *exit* doors, equipment and ductwork necessary for independent ventilation or pressurization, sprinkler piping, standpipes, electrical raceway for fire department communications systems and electrical raceway serving the *interior exit stairway* or *ramp* and terminating at a steel box not exceeding 16 square inches (0.010m<sup>2</sup>). Such penetrations shall be protected in accordance with Section 714. There shall be no penetrations or communicating openings, whether protected or not, between adjacent *interior exit stairways* and *ramps*.

**Exception:** ~~Membrane penetrations shall be permitted on the outside of the *interior exit stairway* and *ramp*. Such penetrations shall be protected in accordance with Section 714.3.2.~~

### **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).

Over the years, the Building Code has eliminated many safeguards, primarily based on the addition of sprinklers. Stair enclosures have become one of the “last lines of defense” and I believe they should remain so. The elimination of the exception will just keep things as they are and maintain the integrity of stair enclosures (and ramps) as the principal means of exiting multi-story buildings. It should also be pointed out that shafts do not have that exception in the 2012 IBC and stair enclosures are certainly more important than mechanical shafts!

### **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).

There will not be any costs associated with maintaining the status quo. Allowing the exception to remain could possibly reduce costs slightly based on not having to add “furred” walls in front of stair enclosure walls but good design can also eliminate that need.

**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).
  - X delete language contained in a published code book? If so, list section(s).  
**2012 IBC Section 1022.5**
  - 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.
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.
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.
5. Who are the parties affected or segments of industry affected by this proposed code change? **Since the proposal retains the status quo, Architects, designers and contractors will not be affected.**
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.
7. Are you aware of any federal requirement or regulation related to this proposed code change? If so, please list the regulation or requirement.