

CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: **Kyle Thrapp**

Date: **8/25/25**

Email address: **kyle@mcmonigal.com**

Model Code: **2024 IRC**

Telephone number: **612-331-1244**

Code or Rule Section: **Appendix BB**

Firm/Association affiliation, if any: **McMonigal Architects**

Code or rule section to be changed: **Appendix BB - Tiny Houses, Section BB104 - Lofts
BB104.2 Loft Access and Egress**

Intended for Technical Advisory Group ("TAG"): **1309 Residential Code TAG**

General Information

Yes No

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

☒ change language contained the model code book? If so, list section(s).

Change ceiling height at loft access and egress.

☐ change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

☐ delete language contained in the model code book? If so, list section(s).

☐ delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

☐ add new language that is not found in the model code book or in Minnesota Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.

No

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.
Change section: BB104.2 Loft access and egress
The access to and primary egress from lofts shall be of any type described in Sections BB104.2.1 through BB104.2.5. The loft access and egress element along its required minimum width shall meet the loft where its ceiling height is not less than ~~3-feet~~ 3'-6".
4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)
Reason 1
Required stair handrails (34" to 38" high) will bump into ceiling if ceiling is 3'-0" high. Increasing required ceiling height at access/egress to 3'-6" high avoids conflict at opening.
Reason 2
Allowable egress width from loft is 1'-8" wide below handrails.
 - An opening that is 1'-8" wide x 3'-0" high is only 5.0 SF, which is less area than standard Emergency Escape and Rescue Opening (EERO) of 5.7 SF and 1'-8" wide minimum.
 - An opening that is 1'-8" wide x 3'-0" high is 5.8 SF, which exceeds standard EERO of 5.7 SF.
2. Why is the proposed code change a reasonable solution?
Occupants have safer egress condition.
3. What other factors should the TAG consider?
N/A

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
N/A
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
N/A
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
N/A
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
N/A
5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is

any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.

N/A

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Occupants have safer egress condition.
2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
N/A
3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
N/A
4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.
N/A

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Author/requestor: **Kyle Thrapp**

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Email address: **kyle@mcmonigal.com**

Model Code: **2024 IRC**

Telephone number: **612-331-1244**

Code or Rule Section: **Appendix BB**

Firm/Association affiliation, if any: **McMonigal Architects**

Code or rule section to be changed: **Appendix BB - Tiny Houses, Section BB104 - Lofts
BB104.2.1.1 Stairway Width**

Intended for Technical Advisory Group ("TAG"): **1309 Residential Code TAG**

General Information

Yes No

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

- ☐ change language contained the model code book? If so, list section(s).
- ☐ change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
- ☐ delete language contained in the model code book? If so, list section(s).
- ☐ delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
- ☒ add new language that is not found in the model code book or in Minnesota Rule.
Add language to BB104.2.1.1 Width

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.
No
3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striethrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.
Add the following after section BB104.2.1.1 Width:
Winder treads and landings are not permitted unless stair meets all requirements in Section R318.7.1.
4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)
Reason
R318.7.4 Walkline for conventional stairs, requires winder treads and landings to have a safe width at the walkline. Tiny house stairs are allowed to be 1'-8" wide minimum below handrails. At this width, a winder tread or landing pushes the walkline to the edge of the walkline. Actual use will be a dimension narrower than what is safe. Online image boards show many examples of dangerous conditions where winder treads or landings make
2. Why is the proposed code change a reasonable solution?
Occupants have safer egress condition.
3. What other factors should the TAG consider?
N/A

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
N/A
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
N/A
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
N/A
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
N/A
5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
N/A

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Occupants have safer egress condition.
2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
N/A
3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
N/A
4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.
N/A

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Code or Rule Section: **Appendix BB**

Firm/Association affiliation, if any: **McMonigal Architects**

Code or rule section to be changed: **Appendix BB - Tiny Houses, Section BB104 - Lofts
BB104.2.1.3 Treads and Risers**

Intended for Technical Advisory Group ("TAG"): **1309 Residential Code TAG**

General Information

Yes No

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

☐ change language contained the model code book? If so, list section(s).

☐ change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

☒ delete language contained in the model code book? If so, list section(s).

Delete entire section BB104.2.1.3 Treads and Risers

☐ delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

☐ add new language that is not found in the model code book or in Minnesota Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.

No

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~strikethrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

Strike entire section: BB104.2.1.3 Treads and Risers

~~Risers for stairs accessing a loft shall be not less than 7 inches and not more than 12 inches in height. Tread depth and riser height shall be calculated in accordance with one of the following formulas:~~

~~1. The tread depth shall be 20 inches minus four thirds of the riser height.~~

~~2. The riser height shall be 15 inches minus three fourths of the tread depth.~~

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.

No

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)

BB104.2.1.3 Treads and Risers (Tiny Houses)

Math explained: Riser height is between 7" and 12" high. Tread depths using the provided formula are as follows:

7"H risers, 10 11/16"D treads

$7" \times 4/3 = 9 \frac{5}{16}"$

$20" - 9 \frac{5}{16}" = 10 \frac{11}{16}"$ D treads

33 degree incline

8"H risers, 9 5/16"D treads

$8" \times 4/3 = 10 \frac{11}{16}"$

$20" - 10 \frac{11}{16}" = 9 \frac{5}{16}"$ D treads

41 degree incline

9"H risers, 8"D treads

$9" \times 4/3 = 12"$

$20" - 12" = 8"$ D treads

48 degree incline

10"H risers, 6 11/16"D treads

$10" \times 4/3 = 13 \frac{5}{16}"$, $20" - 13 \frac{5}{16}" = 6 \frac{11}{16}"$ D treads

56 degree incline

11"H riser, 5 5/16"D treads

$11" \times 4/3 = 14 \frac{11}{16}"$, $20" - 14 \frac{11}{16}" = 5 \frac{5}{16}"$ D treads

64 degree incline

12"H riser, 4"D treads

$12" \times 4/3 = 16"$, $20" - 16" = 4"$ D treads

72 degree incline

- "Shall be" means tread depths must be exactly those dimensions. Standard industry products do not typically come in those dimensions. Tolerances and rounding up or down are not addressed.

- These are steep and dangerous conditions for stairs.
 - For perspective, Chichen Itza (Mayan temple) has incredibly steep-feeling stairs, and those are only 45 degree incline.
 - With all the acceptable design options for egress from sleeping lofts:
1) Code compliant stair, 2) Ships ladder, 3) Alternating tread device, 4) Ladder, this section should be eliminated.
2. Why is the proposed code change a reasonable solution?
Occupants have safer egress condition.
Even with this proposed change, tiny home loft access and egress allows for:
1) Code compliant stair, 2) Ships ladder, 3) Alternating tread device, 4) Ladder
 3. What other factors should the TAG consider?
N/A

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
N/A
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
N/A
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
N/A
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
N/A
5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
N/A

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Occupants have safer egress condition.
2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
N/A
3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
N/A
4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.
N/A

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Model Code: **2024 IRC**

Telephone number: **612-331-1244**

Code or Rule Section: **Appendix BB**

Firm/Association affiliation, if any: **McMonigal Architects**

Code or rule section to be changed: **Appendix BB - Tiny Houses, Section BB104 - Lofts
BB104.2.1.6 Handrails**

Intended for Technical Advisory Group ("TAG"): **1309 Residential Code TAG**

General Information

Yes No

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

☒ change language contained the model code book? If so, list section(s).

Change section BB104.2.1.6 Handrails

☐ change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

☐ delete language contained in the model code book? If so, list section(s).

☐ delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

☐ add new language that is not found in the model code book or in Minnesota Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.

No

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.
~~Handrails shall comply with section R318.7.8.~~ Handrails shall be provided on both sides of stairways meeting this section, and shall comply with section R318.7.8.
4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)
On stairs this narrow (1'-8" wide), it is much safer to have handrail to grasp on each side. While guards are not required, a handrail on an open side will help prevent possible falls.
2. Why is the proposed code change a reasonable solution?
Occupants have safer egress condition.
3. What other factors should the TAG consider?
N/A

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
N/A
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
N/A
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
N/A
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
N/A
5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
N/A

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Occupants have safer egress condition.
2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
N/A
3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
N/A
4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.
N/A

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Telephone number: **612-331-1244**

Code or Rule Section: **Appendix BB**

Firm/Association affiliation, if any: **McMonigal Architects**

Code or rule section to be changed: **Appendix BB - Tiny Houses, Section BB104 - Lofts
BB104.2.2 Ladders**

Intended for Technical Advisory Group ("TAG"): **1309 Residential Code TAG**

General Information

Yes No

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

☒ change language contained the model code book? If so, list section(s).

Renumber reference within BB104.2.2 Ladders

☐ change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

☐ delete language contained in the model code book? If so, list section(s).

☐ delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

☐ add new language that is not found in the model code book or in Minnesota Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.

No

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.
Renumber reference within BB104.2.2 Ladders
Ladders accessing lofts shall comply with Sections ~~BB104.2.1~~ BB104.2.2.1 and BB104.2.2.2.
4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)
Renumber
2. Why is the proposed code change a reasonable solution?
Renumber
3. What other factors should the TAG consider?
N/A

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
N/A
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
N/A
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
N/A
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
N/A
5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
N/A

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
N/A
2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
N/A
3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
N/A
4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.
N/A

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Code or Rule Section: **Appendix BB**

Firm/Association affiliation, if any: **McMonigal Architects**

Code or rule section to be changed: **Appendix BB - Tiny Houses, Section BB104 - Lofts
BB104.2.5 Loft Guards**

Intended for Technical Advisory Group ("TAG"): **1309 Residential Code TAG**

General Information

Yes No

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

☒ change language contained the model code book? If so, list section(s).

Change section BB104.2.5 Loft Guards

☐ change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

☐ delete language contained in the model code book? If so, list section(s).

☐ delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

☐ add new language that is not found in the model code book or in Minnesota Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.

No

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

Change section: BB104.2.5 Loft Guards

Loft guards shall be located along the open sides of lofts. Loft guards shall not be less than 36 inches in height or ~~one-half~~ two-thirds of the clear height to the ceiling, whichever is less. Loft guards shall comply with Section R321.1.3 and Table R301.5 for their components.

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.

No

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)

Occupants have safer condition in loft.

2. Why is the proposed code change a reasonable solution?

Occupants have safer condition in loft.

3. What other factors should the TAG consider?

N/A

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.

N/A

2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.

N/A

3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.

N/A

4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.

N/A

5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.

N/A

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Occupants have safer condition in loft.
2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
N/A
3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
N/A
4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.
N/A

****Note: Incomplete forms will be returned to the submitter with instruction to complete the form. Only completed forms will be accepted and considered by the TAG.