DEPARTMENT OF LABOR AND INDUSTRY

CODE CHANGE PROPOSAL FORM
(Must be submitted electronically)

Author/requestor: Kyle Thrapp

Email address: kyle@mcmonigal.com

Telephone number: 612-331-1244

Firm/Association affiliation, if any: McMonigal Architects

Code or rule section to be changed: R315.5.1 Ceiling height at Sleeping Loft means of egress

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

Date: 8/25/25

Model Code: 2024 IRC

Code or Rule Section: R315.5.1

General Information

	Yes	No
A. Is the proposed change unique to the State of Minnesota?	☒	☐
B. Is the proposed change required due to climatic conditions of Minnesota?	☐	☒
C. Will the proposed change encourage more uniform enforcement?	☐	☒
D. Will the proposed change remedy a problem?	☒	☐
E. Does the proposal delete a current Minnesota Rule, chapter amendment?	☐	☒
F. Would this proposed change be appropriate through the ICC code development process?	☒	☐

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

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3. Provide *specific* language you would like to see changed. Indicate proposed new words with <u>underlining</u> and ~~strikethrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.
Change section: R315.5.1 Ceiling height at sleeping loft means of egress
A ceiling height of not less than ~~3 feet~~ 3'-6" shall be provided for the entire width of the means of egress from the sleeping loft.

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.)
<u>Reason 1</u>
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.

<u>Reason 2</u>
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

****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.

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Code or rule section to be changed: R315.5.2.1 Width (Sleeping Loft Egress)

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

Date: 8/25/25

Model Code: 2024 IRC

Code or Rule Section: R315.5.2.1 Width

General Information

		Yes	**No**
A.	Is the proposed change unique to the State of Minnesota?	☒	☐
B.	Is the proposed change required due to climatic conditions of Minnesota?	☐	☒
C.	Will the proposed change encourage more uniform enforcement?	☐	☒
D.	Will the proposed change remedy a problem?	☒	☐
E.	Does the proposal delete a current Minnesota Rule, chapter amendment?	☐	☒
F.	Would this proposed change be appropriate through the ICC code development process?	☒	☐

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
   <u>underlining</u> and ~~strikethrough~~ words proposed for deletion. Include the entire code (sub) section or
   rule subpart that contains your proposed changes.
   Add the following after section R315.5.2.1 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.)
   <u>Reason</u>
   R318.7.4 Walkline for conventional stairs, requires winder treads and landings to have a safe width
   at the walkline. Loft access 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?
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   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.
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