



The Association of Minnesota Building Officials

"Safe Homes – Resilient Communities"



MN Senate Local Government Policy Committee
95 University Ave West
Saint Paul, MN 55155

March 22, 2022

RE: Senate File 3259

Honorable Committee Members,

The Association of MN Building Officials (AMBO) thanks the committee for their work towards affordable housing solutions & humbly submits the following concerns regarding SF3259:

- **Art. 4, Sec. 2:** Requires approval of building permits in 60 days and current law requires "Failure of an agency to deny a request within 60 days is approval of the request."
 - **The change can require issuing a permit for plans that are NOT in compliance with minimum state code requirements - this is a serious life safety concern.**
 - Automatically approved non-complying plans will be held up during construction.
 - This change/amendment applies to commercial and residential construction.
 - When a building permit is not approved in 60 days, it's typically because the developer/builder is seeking additional time to update building plans or finalize project financing (this is true for affordable housing and/or commercial projects).
 - *The proposed change reduces flexibility, may create a more demanding process for all parties & may lead to a higher rate of denied applications & more fees.*

We hope to help limit any unintended consequences and help our construction partners achieve affordable housing without compromising safety.

Thank you for your public service,

Jerry Backlund,
AMBO President