



# The Association of Minnesota Building Officials

*"Safe Homes – Resilient Communities"*

---



Honorable Housing & Homelessness Prevention Committee  
Minnesota State Capitol  
Saint Paul, MN 55155

3/5/24

***RE: Concerns – Concerns with SF3080, Art. 8, Sec. 2(b)***

Honorable Committee Members,

The Association of MN Building Officials (AMBO) applauds the legislature's effort to increase affordable housing opportunities across the state. **But currently, AMBO writes to express concerns to Article 8, Sec. 2(b) & Article 9.**

AMBO's concerns are as follow:

**1. Article 8, Sec. 2(b)**

- **Impacts complex commercial construction (not just residential).** Nothing in this section limits the provisions to affordable residential housing.
- **Possible increase of denials.** Building departments are not in control of plan submittals, plans completeness, or owner representative timelines and have no control over the time owner representatives take to resubmit necessary revisions to plans.
- **Friction in working relationships.** Building departments often work with builders for months, accepting partial plans as requested by builders and owners while they secure financing and/or right-size their projects. This takes time and requires city resources. If a permit must be denied or approved within 60 days or all revenue earned for services provided will be lost, permits will be approved or denied, but the unintended consequences may negatively impact partners.

**2. Article 9**

- Nearly all additions involve substantial remodeling of the structure, and a square foot valuation of only the addition does not reflect the cost-of-service delivery required by a city.
  - i. **AMBO requests the deletion of "and additions to".**

AMBO is here to serve as a resource for legislators. Our members believe in, and strive for, high quality community service. Our mission is to ensure safe homes and resilient communities.

Sincerely,  
Jerry Backlund, AMBO President