



The Association of Minnesota Building Officials

"Safe Homes – Resilient Communities"



Honorable Housing & Homelessness Prevention Committee
100 Rev. Dr. Martin Luther King Jr. Blvd.
Saint Paul, MN 55155

3/6/24

RE: SF3964 - Serious Safety Concerns & Workability Issues

Honorable Committee Members,

The Association of MN Building Officials (AMBO) applauds the legislature's effort to increase affordable housing opportunities across the state. **However, at this time, AMBO writes to express serious safety & workability concerns with SF3964.** Including:

- 1. Sect.1, subd.10 - Parking prohibition is contrary to the American w/ Disabilities Act parking requirements**
 - It is ambiguous if the bill permits the development of housing and infrastructure that does not provide access for an important segment of society.
- 2. Sect.1, subd.13(a) - Automatic Building Plan Approval After 60 days**
 - Requiring approval for plans that are NOT in compliance with minimum safety requirements based on a technicality – **is a serious life-safety concern.**
- 3. Sect.1, subd.13(c) - Permit timing fully controlled by owners & developers**
 - Gives developers & owners complete control over the continual start & stop of building permit review, increasing odds of confusion & auto-approval.
- 4. Sect.2, subd.1(d) - Meeting the Zero Energy Ready Home standard is a high hurdle**
 - Requires additional steps, more staff & training, and will be difficult for small cities, including - verification that plans meet a federal standard, that the building contractor is registered with DOE, and that a DOE registered third-party inspects & certifies. This would all need to be done before issuing a certificate of occupancy.
- 5. Sect.1, subd.12 - Verifying "affordable" before & after demo/remodel adds time & cost**
 - These regulations add staff time and expense & will slow processing for owners.
 - **Ex. "Remodel"** – Requires staff to determine if a residence is "affordable" prior to the remodel and after and that the deed and dedication complies all prior to issuing the certificate occupancy.

AMBO is here as a resource for legislators drafting this bill. Sincerely,

Jerry Backlund, AMBO President