



# The Association of Minnesota Building Officials

*"Safe Homes – Resilient Communities"*

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

3/11/24

***RE: SF3964 - Serious Safety Concerns & Workability Concerns***

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.2, subd.2** - Automatic Building Plan Approval After 60 days.
  - **Automatic approval of a building permit that is NOT in compliance with minimum safety requirements – is a serious life-safety concern.**
  - As written, it applies to commercial construction, like hospitals, not just residential.
2. **Sect.3, subd.5** – Valuation should be for “new” residential buildings only.
  - As written the bill covers remodeling, and a generic square foot valuation of a remodel does not reflect the cost-of-service delivery required by a city.
  - **Recommendation - Line 2.18, after the word “of” add the word “new”**
3. **Sect.7, subd.1(d)** - Meeting the Zero Energy Ready Home requires additional time & work.
  - Practically this requires additional steps, staff & training, and may be difficult for small cities. To comply, and prior to issuing a certificate of occupancy, it requires additional verification that plans meet a federal standard, use of a building contractor that is registered with DOE, and a DOE registered third-party verification.
4. **Sect.7, subd.9** – Affordable housing; Replacement required.
  - 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 and after a remodel, that the deed and dedication complies prior to issuing the certificate occupancy, and that owners don't fix up their home too much.
    - This may limit people from investing in their homes.

AMBO is here as a resource for legislators.

Sincerely, Jerry Backlund, AMBO President