



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

3/11/24

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