

**Meeting Discussion and Field Review Findings**

Mr. Robert Labrosse, Building Official  
City of Cottage Grove  
12800 Ravine Parkway South  
Cottage Grove, MN 55016

February 12, 2020

**Location/Venue:** Historic Hope Glen Farm, 10276 E Point Douglas Rd. S., Cottage Grove, MN

**RE:** Place of Public Accommodation- Building Code Site Visit Observations

Dear Mr. Labrosse,

Thank you for inviting us to your city on January 31 to discuss and visit the site at Historic Hope Glen Farm. Below is a summary of our discussions, observations and recommendations:

Discussion:

1. Pavilion Discussion:
  - a. Open air pavilions are defined as buildings within the state building code as a “structure.” This is further supported by the definition of “building area” which includes all space located under a roof.
  - b. You stated that the city may have approved a pavilion for an A-2 occupancy without the required fire protection systems in accordance with Minnesota Rule 1300.0110, Subpart 12 given:
    - i. A specific size,
    - ii. That the structure is completely open on all sides allowing uninhibited means of egress in all directions.
    - iii. However, we didn’t see the details of any action granting approval of an alternate recorded and entered in the files of the Department of Building Safety.
2. Lean-to Addition Discussion: You stated that the city may have approved an open-air lean-to addition to an existing A-3 occupancy for an A-2 use without the required fire protection systems in accordance with Minnesota Rule 1300.0110, Subpart 12 given:
  - i. A specific size,
  - ii. That the structure is completely open on three sides allowing uninhibited means of egress in all directions.
  - iii. However, we didn’t see the details of any action granting approval of an alternate recorded and entered in the files of the Department of Building Safety.
3. Existing building (barn) discussion: The initial proposed barn use was A-3 for ceremony purposes and did not include food and beverage consumption within the building. As an A-3 occupancy, the building did not require automatic fire sprinklers to be installed because the size and occupant load were under the threshold for sprinkling in accordance with the Fire and Smoke Protection chapter of the state building code.
4. The venue owner/operator has changed the use of the A-3 occupancy to A-2 and altered the

openness of both the lean-to addition and the freestanding pavilion by adding detachable fabric walls installed with twist locks from the exterior side. The building official must determine whether the altered conditions violate the terms of the initial approvals listed above.

5. The change from an agricultural building to an assembly occupancy changes the structural risk category per IBC Table 1604.5. The barn should be evaluated by a structural engineer to ensure that it complies with the requirements for vertical and lateral loading.

Site Visit Observations:

1. Pavilion:

- a. The space is not equipped with an automatic fire sprinkler system or egress illumination.
- b. The pavilion is enclosed with fabric walls mounted to the columns and overhead structure with thumb-turn clasps mounted on the exterior side of the enclosure.
- c. Exit signage has been added indicating three exits.
- d. One exit discharges to an open field area. The other two exits discharge to a confined space bounded by other buildings and a non-compliant stairway with only one non-compliant handrail. There is not a clear and discernable path to a safe dispersion area on the north side of the pavilion.
- e. The floor space within the pavilion is filled with long dining tables and chairs having minimal access aisle width and minimal cross aisle access to the exits. Crowded conditions within the pavilion, fixed fabric walls, and the lack of a sprinkler system create a hazardous condition.

2. Lean-to addition to the Barn:

- a. The space is not equipped with an automatic fire sprinkler system or egress illumination.
- b. The lean-to addition is enclosed with fabric walls mounted to the columns and overhead structure with thumb-turn clasps mounted on the exterior side of the enclosure.
- c. Exit signage has been added indicating two exits.
- d. One exit discharges to a confined space bounded by other buildings and a non-compliant stairway with only one non-compliant handrail. There is not a clear and discernable path to a safe dispersion area.
- e. The lean-to addition has a large overhead door opening to the barn allowing food and drink to move freely between the spaces.

3. Historic Barn:

- a. The space is not equipped with an automatic fire sprinkler system or egress illumination.
- b. Because the space is contiguous with an A-2 occupancy (bar in the lean-to addition) and not separated, it is also classified as an A-2 Occupancy.
- c. The main space has three means of egress, two of the three exit through the lean-to addition.

4. Accessibility for the disabled:

- a. Exterior accessible routes are not permitted a slope greater than 5% (1:20) Since the facility is only available to the public during the summer, a Code Modification per Minnesota Rule 1300.0110, Subpart 12 may be an acceptable alternative, but you will want to have it documented. The ramp from the pavilion up to the level of the public restrooms is over 5%.
- b. Handrails, handrail extensions, guard rails and edge protection along ramps must comply with the related requirements along accessible routes.
- c. Hot water and waste plumbing piping within the restrooms must be insulated to protect from scalding.

- d. Sites, buildings, structures, facilities, elements and spaces, temporary or permanent, shall be accessible to persons with physical disabilities.

Recommendations:

1. Pavilion and Lean-to Addition:
  - a. Require an automatic fire sprinkler system and egress illumination in each.
  - b. Require an architect to design and certify a means of egress system to compliant areas of dispersion. This plan should locate and sign the exits appropriately and provide a furnishings layout to ensure adequate access aisleways and cross aisles per the state building code.
  - c. If sprinkling is provided and an approved means of egress is provided, fabric coverings over ancillary open sides of the pavilion or lean-to addition should not be a concern.
2. Historic Barn:
  - a. Require an automatic fire sprinkler system and egress illumination for the space now used as A-2 occupancy.
  - b. Require a structural analysis by an engineer licensed in Minnesota and make structural improvements as necessary.
  - c. Ensure that all means of egress have a clear, unobstructed and discernable path to either a public way or safe dispersion area.

This is not an all-inclusive code analysis, but rather general observations and answers to specific questions the city brought forward at the meeting.

Sincerely,



CONSTRUCTION CODES & LICENSING DIVISION  
Greg Metz, Building Plan Review Supervisor

Cc: Scott McKown, Assistant Director, DLI/CCLD