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April 19, 2024

St Paul Safety and Inspections
375 Jackson Street, Suite 220
St. Paul, MN 55101

Re: 123 Wheeler St S, Ref. #111831 – Application for Appeal Addendum

To Whom It May Concern:

This is to request consideration for the deficiencies that were included in the fire inspection correction notice.

1. Dryer vent – notice states that flexible dryer vent is approx. 10 ft. Rakhma measures its current transition vent to be ~79” (see photo at end of document). The connection from the dryer as well as to the outside is solid metal and does not contain any screws. The vent is not concealed within construction. It is our understanding that code allows up to 8 ft for transition vent based upon the following (2020 Minnesota Mechanical and Fuel Gas Code 504.8.3 Transition ducts): “Transition ducts used to connect the dryer to the exhaust duct system shall be a single length that is listed and labeled in accordance with UL 2158A. Transition ducts shall be not greater than 8 feet (2438 mm) in length and shall not be concealed within construction.” (<https://www.dli.mn.gov/business/codes-and-laws/2020-minnesota-state-building-codes>) *fyi... we were unable to find the code on the City of St. Paul website.*
2. Egress doors – locks
Rakhma has several things in play related to ‘egress doors – locks’ that we would like to have considered.
 - a. Rakhma, a non-profit organization with group homes for mostly low income dementia residents, has been working with vendors to understand what options are available to incorporate a fail-safe exit (for safety in an emergency) while also ensuring the day-to-day safety of our residents (vulnerable adults). Rakhma understands the risk of elopement first hand. In the past several years, we have had 2 residents elope from our Rakhma Joy Home, and 1 from an adult day center. One resident was found across town sleeping on a bus, another was picked up by police after consuming too much alcohol, and the third we were fortunate to have found him wandering around the neighborhood (note, it was not just down the block). Therefore, we feel if we do not implement a suitable solution, we increase the safety risk of our residents.
 - b. Rakhma is working with a vendor to determine the appropriate solution. At this point, we believe it includes:
 - a. a wired and connected smoke detector system (connected to a fire panel)
 - b. a fail safe exit that will include doors with a key pad for entrance/exit
 - c. the fail safe exit will release if the smoke detectors are set off
 - d. there will be one-motion override in the home entrance to release the fail safe exit (it will have an alarm attached so that we know if the fail safe exit has been released)
 - e. we are also looking at gate/fence replacement requirements because this also needs to be considered for the fail safe exit (depending on the solution, we may request a variance that the fence gate not automatically open if the smoke alarm is set off for 2 reasons – 1) we want to ensure the safety of our residents from elopement during an emergency, we are working with an architect on best evacuation routes; 2) we have experience in one of our other homes of a resident intentionally setting off the fire alarm in order to elope)

The vendor is currently following up with the St. Paul Fire Marshall to ensure the solution meets code/requirements.

- c. Once an appropriate solution has been finalized, due to the amount of investment, Rakhma intends to gather 2 competitive quotes based upon our procedures.
- d. Rakhma has applied for a MN Living Well grant to help cover the expense of this solution. Rakhma is currently in the running to receive the grant. The grant is to be awarded by July 1, 2024. This should align with feedback from the Fire Marshall, receiving competitive quotes, awarding the work to a vendor, and getting the work scheduled. Based upon grant requirements, money cannot be spent prior to July 1, 2024. Rakhma realizes that the work needs to be completed even if we are not awarded the grant, but for the sustainability of our organization, it would be best to pay for these expenses with money from the grant.

Based upon the above, Rakhma is requesting a delay in reinspection. Rakhma will work with the current vendors prior to the hearing date to understand when the work can be scheduled to implement the final solution.

3. Exterior walls and front porch –

https://library.municode.com/mn/st_paul/codes/code_of_ordinances?nodeId=PTIILECO_TITVIBUHO_CH34MIPRMASSTALSTPR_S34.08EXPRARREPR

- a. SPLC 34.09 (1) – *“Protective treatments. All exterior surfaces, including, but not limited to doors, door and window frames, cornices, porches, trim, balconies, decks and fences, shall be maintained in a professional state of maintenance and repair. Exterior wood surfaces, other than decay-resistant woods, shall be protected from the elements and decay by painting, by utilizing paint which is not lead-based, or other protective covering or treatment. Peeling, flaking and chipped paint shall be eliminated and surfaces repainted. All siding, stucco, masonry and/or similar finishes, as well as those between the building envelope and the perimeter windows, doors and skylights shall be maintained weather resistant and water tight. All metal surfaces subject to rust or corrosion shall be stabilized and coated to inhibit future rust and corrosion or replaced with an approved corrosive resistant material. Oxidation stains shall be removed from exterior surfaces. Surfaces designed for stabilization by oxidation are exempt from this requirement.”*

Rakhma will ensure that all chipped paint is scraped and repainted. Rakhma will also ensure that masonry work is free of leaks.

- b. SPLC 34.09 (2)(a) – *“Foundations, walls, roof and other exterior surfaces. Every foundation, exterior wall, roof and all other exterior surfaces shall be maintained in a professional state of maintenance and repair. a. The foundation elements shall adequately support the building at all points.*

Rakhma does not understand why this code has been cited. The brick on the exterior of the home is purely decorative.

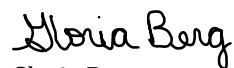
- c. SPLC 34.33 (1)(b) – *“Structures—Exterior standards on nonresidential, industrial, commercial and institutional properties: The owner of any premises regulated by this section, as specified in section 34.03, shall comply with the following requirements:*

(1) Foundations, wall, roof and other exterior surfaces. Every foundation, exterior wall, roof and all other exterior surfaces shall be maintained in a professional state of maintenance and repair. (b) Every exterior wall shall be free of holes, breaks, loose or rotting boards or timbers and any other conditions which admit dampness to the interior portions of the walls or to the interior spaces.

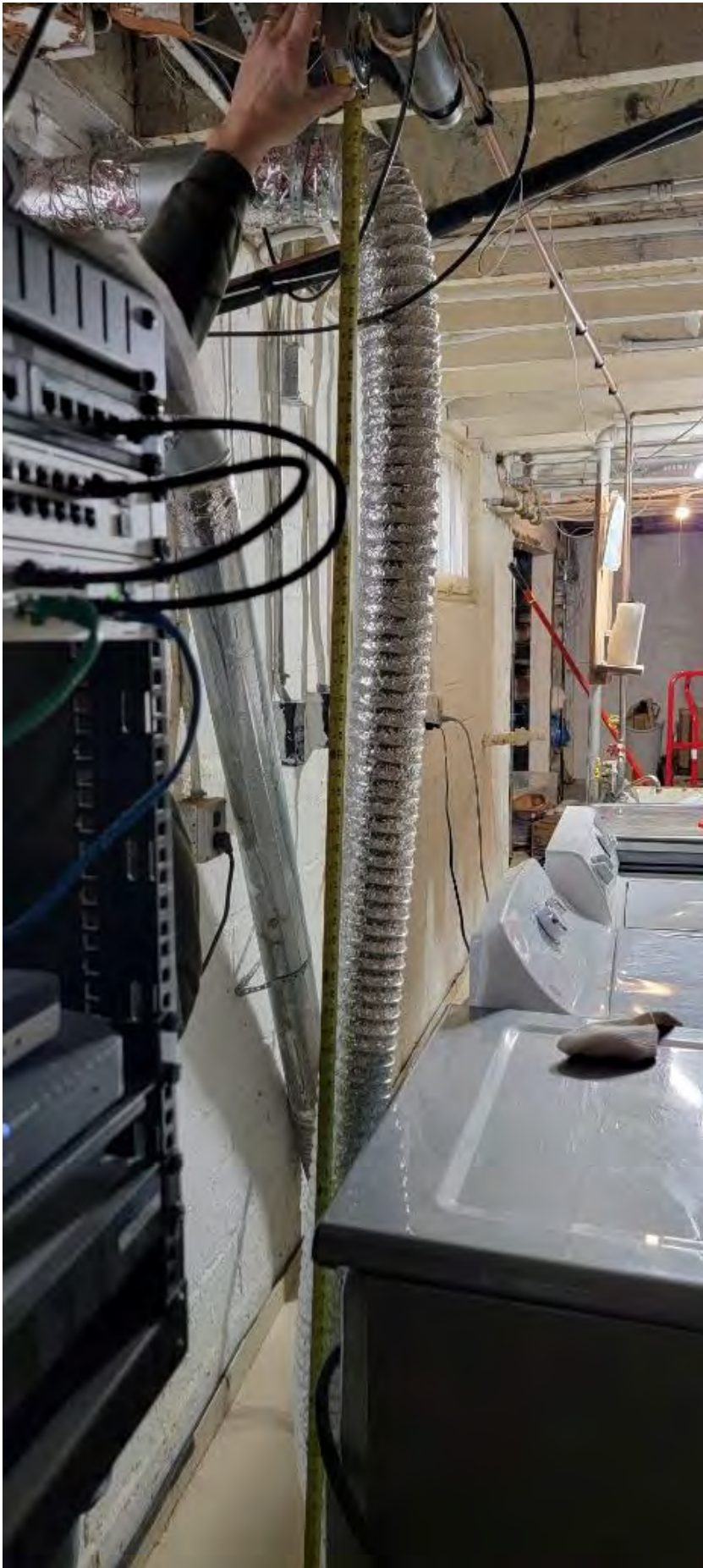
Rakhma will ensure that the masonry work is free of leaks.

Please note that Rakhma mailed check number 3712 to cover the filing fee on April 20, 2024. Thank you for your consideration of these items. We look forward to the hearing to learn more.

Sincerely,

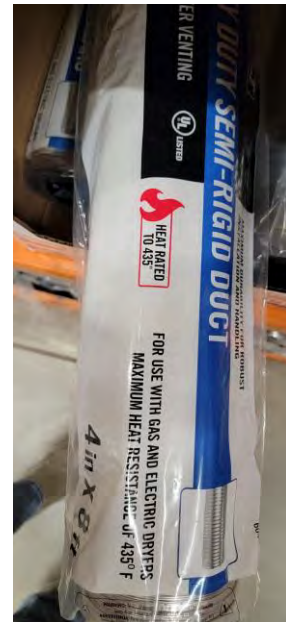


Gloria Berg
Interim Operations Director



Dryer exhaust vent:
Current transition duct length is ~79"
It connects to solid metal ductwork at the dryer and to the outside connection.

During the hearing on Tuesday, May 7, 2024 we were asked to provide the UL Listing on the material. Here is what was purchased:



Here is the tape that was used to connect the hoses:

