



CITY OF HOUSTON

Sylvester Turner

Mayor

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Dear Members of the Texas Legislature:

I write to you today to express my opposition to Senate Bill 1106 and House Bill 3622. These bills will eliminate the choice that Texas has enjoyed for many years which enables each municipality to decide which of the two major plumbing codes is most appropriate for their area. Presently, a local government can choose between the *Uniform Plumbing Code* from the International Association of Plumbing and Mechanical Officials and the *International Plumbing Code* from the International Code Council.

The attempt to write out of state law the *Uniform Plumbing Code* and to revoke the ability of municipalities such as Houston (which uses the *Uniform Plumbing Code*) to choose is very shortsighted. The bill fails to take into consideration the vastly different needs across our large state with respect to geography and climate alone. Areas such as the Panhandle, with snow and ice, have different needs than El Paso, where temperature is more arid with less chance of freezing.

Additionally, this unfunded mandate would cost cities such as Houston tens of thousands of dollars for the purchase of new code books and the retraining of building and plumbing code officials, not to mention the confusion this change would cause in the plumbing industry. Houston, as the fourth largest city in the United States, would be especially hard hit given the size of the plumbing industry in our rapidly-growing city.

The 2018 *Uniform Plumbing Code* includes a new Peak Water Demand Calculator for efficiently sizing plumbing systems in accordance with today's lower flow rates for plumbing fixtures and appliances. This advancement calculates expected peak flow rates in modern buildings of all sizes, resulting in savings on water, energy and material costs. It represents the first significant update in the sizing of plumbing systems since the 1940's. The IPC offers no such innovation.

Further, the IPC requires six code books to cover the same amount of installation types — at four times the cost — than the UPC's one code book. I urge you to oppose passage of this legislation.

Sincerely,

Sylvester Turner,
Mayor