

Peters, Kelli (DLI)

From: Brian Hoffman <BHOFFMAN@stlouispark.org>
Sent: Monday, March 04, 2013 4:39 PM
To: DLIRULES (DLI)
Subject: Comments for R-4139
Attachments: Document1.docx

Kelli,

Please accept the attached comments for the Plumbing Board consideration of rules.

Brian

Minnesota State Plumbing Board
Attention: Kelli Peters
Department of Labor & Industry
443 Lafayette Road North
St. Paul, MN 55155

March 3, 2013

Dear Ms. Peters:

I was surprised to learn that a public board doing the public's business and appointed by the Governor of our State had so quickly eliminated consideration of the IPC model plumbing code which coordinates with other State Construction Codes.

All of the ICC codes are developed and coordinated at the national development level and many of the International codes are adopted in virtually every state in the US. Additionally, the Federal Government uses the IPC as the plumbing code for HUD. This cannot be said of the Uniform Plumbing Code.

Minnesota is seriously considering the adoption of the 2012 International Green Construction Code, **which is an overlay code/companion to the 2012 International Building Code and addresses a wide** range of construction disciplines and practices.

I understand that the IPC is more of a performance based code that is friendlier to businesses and modern building design that potentially allow lower construction costs. I also understand that reportedly the UPC is favored by plumbers but not by the rest of the building community. When is public policy supposed to be shaped by an industry to serve an industry?

The Minnesota State Plumbing Code that we currently have on the books has served our state well. This is a huge step to replace it with either the IPC or the UPC. Until the IPC gets a complete hearing process and public involvement to determine if it is, indeed, the best option, the Plumbing Board is not acting as public servants.

Please consider my request to return to the beginning of the model plumbing code evaluation process.

Sincerely,

Brian Hoffman

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