

From: [Jonathan Sargeant](#)
To: [RULES, DLI \(DLI\)](#)
Subject: 2018 UPC
Date: Monday, October 26, 2020 10:29:33 AM

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Good morning,

I just received the notice on Minnesota's proposed adoption of the 2018 UPC. We have interest in the coverage for fuel gas and medical gas piping code coverage and I my records indicated that Minnesota utilizes the 2018 International Fuel Gas Code and the NFPA 99 for those two product classes. My concern is that the 2018 UPC has coverage as well and those coverages may conflict with the IFGC and 99. Does Minnesota delete Chapters 12 and 13 from the UPC when you adopt that code?

Jonathan Sargeant
Manager of Codes and Standards
Omegaflex
(703) 946-5848

From: [Scott McCarty](#)
To: [RULES, DLI \(DLI\)](#)
Subject: Plumbing code question
Date: Monday, October 26, 2020 10:21:18 AM
Attachments: [image003.png](#)

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To whom it may concern,
I see that the language is still in the code regarding the domestic dishwashers and the need for an air gap. I had heard that this was going away and I was hoping it was going away. Was there much discussion regarding this code item? (Chapter 4714, Section 807.3)





Minnesota Plumbing Board
443 Lafayette Road N.
St. Paul, MN 55155

Via Electronic Delivery

November 23, 2020

Members of the Minnesota Plumbing Board,

With the conclusion of rulemaking for the Minnesota Plumbing Code, Housing First Minnesota offers the following comments on both the outcome and the process utilized by the Minnesota Board of Plumbing.

Thoroughness of The Process

I want to first recognize and thank the Board for its commitment to conducting a thorough and inclusive review of all proposed amendments. We can all agree that a thorough review in which all viewpoints are welcomed yields better results. Regarding amendments, no model code is perfect, and amendments empower Minnesota to craft building codes that bring about the statutorily required balance of safety, durability and affordability. The Board's willingness to accept amendments is central to this accomplishment.

Timing and Length of Process

The thoroughness of the process does, take significant time, both in review and implementation, and as such, Housing First Minnesota asks the Board to consider shifting to the same six-year code cycle employed by the Department of Labor and Industry. From start to finish, this process has taken nearly three years. COVID has of course had an influence on this time frame, but nonetheless, this new Plumbing Code will go into effect more than a year after the changes to the state building codes and roughly six months after the 2020 Electrical Code changes.

Shifting to a six-year cycle would create alignment with the construction code changes from the Commissioner of Labor and Industry, with its concurrent technical reviews with the Technical Advisory Groups formed by the Construction Codes Advisory Council. This move would provide for a coordinated consideration of all construction codes, costs and implementation of changes. Thank you for giving this concept consideration.

Dishwasher Air Gap

Although the dishwasher air gap added only a nominal cost to new-home buyers and homeowners renovating their kitchens, it nonetheless is emblematic of the flaws in our state's housing regulatory environment. It was resoundingly disliked by homeowners and plumbing professionals and its removal does not jeopardize public safety. This suggests that we can still improve our process and enjoy better decision-making by our housing regulators in Minnesota.



The removal of this mandate is important in many respects. First, through this act of lifting an unnecessary mandate, the Board's action is truly unique and nearly unprecedented. The productive action of the Board here to positively impact affordability is to be acknowledged. The Board has engaged plumbers, builders and homeowners who unanimously agreed that this mandate was not necessary. Housing First Minnesota calls for other housing regulators to follow suit and remove unnecessary mandates from their rules and regulations, thereby allowing thousands more Minnesotans to gain access to homeownership.

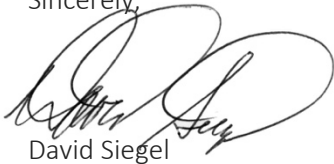
Importantly, the air gap regulatory journey illustrates the imperfection of the model code process. Over the years, the voice of product manufacturers and other special interest groups have drowned out the voices of contractors, skilled tradespersons and building officials, all seeking to protect home affordability, in the development of the various model codes. All too often, code mandates are included to benefit the organizations advocating for their inclusion at the detriment of the homeowner who pays for all of these specious requirements.

Conclusion

Thank you for your time and attention. We offer our praise to regulators who elevated common sense, and remind all of us in the code development process that we must place the affordability on a much higher plateau as we consider future changes. Our goal must be to provide the opportunity for homeownership for everyone, everywhere.

Please feel free to contact me at david@hosuingfirstmn.org or (651) 697-1954 with any questions about our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Siegel', written in a cursive style.

David Siegel
Executive Director

From: [Gary Reinking](#)
To: [RULES, DLI \(DLI\)](#)
Subject: NEW RULES TO THE PLMG CODE
Date: Monday, October 26, 2020 9:27:16 AM

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What are the new rules? We have had too many be amended with not enough input.

Thank you

Gary Reinking

Vice President

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