



**INTERNATIONAL ASSOCIATION OF
PLUMBING AND MECHANICAL OFFICIALS**

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Good Afternoon Chairman Tarwater and members of the Kansas House Commerce, Labor and Economic Development Committee. My name is Brian Rogers and I am the Region IV Field Service Manager for the International Association of Plumbing and Mechanical Officials (IAPMO) covering Kansas, Nebraska, Missouri, Iowa and Illinois. IAPMO, founded in 1926, develops national model codes for plumbing and mechanical systems. Our codes are designated as "American National Standards" through the American National Standards Institute.

We oppose House Bill 2703 because it will preempt all local jurisdictions from making amendments to national codes that are more restrictive and because the lack of clarity in the language itself gives the bill a broad reach, if enacted. Specifically,

- This bill does not reference any current statute that would be impacted should this bill pass. It is my understanding that there is no statewide code currently adopted and that municipalities have the option to choose their own codes. Is the intent of this bill the establishment of a statewide code for the entire building industry and the plumbing realm as well as all others?
- In the definition of "National Model Code" on page 1, our organization (IAPMO) is not specifically listed. A number of municipalities in Kansas, including some of the state's largest cities such as Topeka, already adopt the IAPMO *Uniform Plumbing Code*® and we would like that to remain in effect with the addition of including IAPMO by name in the language of this bill.
- Are local jurisdictions restricted from amending the National Model in any way? Many jurisdictions across the country make local amendments to statewide codes to address specific, local issues. Would this change in Kansas so that no local options are allowed?
- Are local jurisdictions restricted from amending standards that are established under a state adopted or national model code?
- Finally, an additional concern is that our code could be excluded from use by municipalities that already adopt it if this law is interpreted in such a manner that our code could be construed as more stringent than the code adopted currently for public buildings. When state law and state adopted standards are referenced on page 2, line 35 & 36 does this mean regardless of what national model code is adopted by jurisdiction if there are conflicts the state adopted standard shall prevail even though it currently only applies to state buildings?

This lack of clarity should be addressed in the legislation before IAPMO would be able to support the passage of House Bill 2703. Thank you for your time and I am happy to entertain any questions members of the Committee might have.