



January 14, 2021

Construction Industries Division
P.O. Box 25101
Santa Fe, New Mexico 87504
Attention: Public Comments

POSITION: Support for Statewide Adoption of 2021 Uniform Codes developed by IAPMO

Dear Mary James and the Construction and Industry Division Officials,

On behalf of the International Association of Plumbing and Mechanical Officials (IAPMO), I am submitting comments for the record regarding proposed changes to the State's Plumbing and Mechanical Codes. As the Division considers amendments to the administrative codes, IAPMO strongly encourages review and adoption of the 2021 Uniform Plumbing Code (UPC) and 2021 Uniform Mechanical Code (UMC).

Since the 1960's, New Mexico has adopted the Uniform Codes as the foundation of its plumbing and mechanical regulations. For nearly five decades, the state has benefited from the innovative methods and materials, comprehensive installation guidelines, and advanced provisions in water efficiency, water reuse, and system performance. The Uniform Codes prioritize the public's health, safety and welfare and will continue to serve the residents of New Mexico.

The UPC and UMC are developed using consensus-development procedures recognized by the American National Standard Institute (ANSI). ANSI's third-party oversight ensures due process, openness and balance, and brings together stakeholders representing a variety of viewpoints and interests. The UPC and UMC are the only plumbing and mechanical codes designated as an American National Standard, meaning all parties have a voice and a vote and work together to achieve true consensus on the proper installation and inspection of plumbing and mechanical systems.

The Uniform Plumbing Code and Uniform Mechanical Code maintains the necessary balance between prescriptive requirements and allowable performance standards. Enforcement is simplified, as there are fewer areas for field interpretation, and the code allows engineered design systems by architects and the professional design community. Both codes maintain proven health and safety standards, while remaining current with innovative technology and methods. They are the most cost-effective, consistent, and easy-to-use codes available in the plumbing and mechanical industry.

In light of the extreme drought conditions the state is experience and will likely experience in the coming years, the 2021 UPC includes Appendix M, Peak Water Demand Calculator (WDC), that could help residents reduce water usage. The WDC is a new tool that determines pipe sizes in accordance with today's lower flow rate plumbing fixtures and appliances. This innovative advancement calculates expected peak flow rates in modern residential buildings of all sizes, resulting in savings on water, energy, and material costs. Based on statistical data and sound



probability models, it represents the first significant update in the sizing of plumbing systems since the 1940s.

The 2021 edition also contains a unique provision that addresses the impact of water temperature on the potential for Legionella growth, in Appendix N. This provision addresses the impacts of waterborne pathogens and how water temperature can help to reduce the risk of disease. For example, when schools and office buildings were closed for many months during the COVID-19 pandemic, there was great concern that there was stagnant water resting in those plumbing systems. If not handled correctly or if new systems are not in place, water that has remained stagnant for a period of time can foster the growth of bacteria that seriously threatens people's health and well-being.

The 2021 Uniform Mechanical Code provides key provisions that include energy provisions for fuel gas systems in Appendix E, and geothermal energy systems provision in Appendix F. The UMC contains installation, venting, and combustion air of fuel gas appliances that correlate with NFPA 54. The code also provides complete hydronics provisions; including heating and cooling appliances, radiant heating and cooling, hydronic space heating; and snow and ice melt systems. Lastly, the UMC contains energy provisions for fuel gas systems.

Professionals in the plumbing and mechanical industry – installers, designers, inspectors, and government officials – prefer the uniform codes and have shown their support nationwide. The Mechanical Contractors Association of New Mexico, the United Association Local 412, and the Sheet Metal Contractors National Association of New Mexico are some of the main stakeholders that value the UPC and UMC and wish to see its continued adoption.

The 2021 Uniform Plumbing Codes and Uniform Mechanical Codes are effective, efficient, work seamlessly with other construction codes in the state, and they will continue to safeguard public health and safety in New Mexico.

Thank you,

A handwritten signature in black ink that reads "John C. Mata". The signature is written in a cursive, flowing style.

John Mata
Director, Field Services
IAPMO