

**From:** [Sunset Advisory Commission](#)  
**To:** [Trisha Linebarger](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, December 13, 2018 1:23:06 PM

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-----Original Message-----

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission  
Sent: Thursday, December 13, 2018 10:23 AM  
To: Sunset Advisory Commission <Sunset@sunset.texas.gov>  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD PLUMBING EXAMINERS

First Name: Dianne

Last Name: Bangle

Title: CEO

Organization you are affiliated with: Real Estate Council of Austin

Email: dianne.bangle@reca.org

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or  
Opposed:

Dear Texas Sunset Commission:

I am writing on behalf of the Real Estate Council of Austin (RECA), which is comprised of over 1,900 commercial real estate professionals throughout Austin and represent the premier advocacy organization for the Central Texas commercial real estate industry. RECA would like to provide comments on the Sunset Staff Report for the Texas State Board of Plumbing Examiners (TSBPE) on an issue currently not listed in the report, but worth consideration by the commission for implementation.

Texas Occupations Code § 1301.255 as currently enforced by 22 Texas Administrative Code § 367.2 requires the TSBPE to adopt the Uniform Plumbing Code (UPC) and the International Plumbing Code (IPC). The dual provisions in the state code has inadvertently created conflict for the development industry due to the lack of a consistent code across market.

For example, many of RECA's member companies operate in multiple cities like Round Rock, Leander, Cedar Park, many of which use the IPC. However, the City of Austin uses the UPC, which in many cases means that a builder could have the exact same floor plan in multiple markets, but the plumbing requirements could be vastly different.

Over the last decade, many cities throughout Texas, including Austin, have shifted to the International Family of Codes for nearly all code provisions such as the International Building Code, International Residential Code, International Fire Code, and others. This is largely seen as an industry "best practice" that ensures consistency across the board.

RECA respectfully requests that the Sunset Commission review and recommend the adoption of a single plumbing code, the International Plumbing Code for the TSBPE and the state of Texas.

Please contact me directly if you would like any additional information and if RECA can serve as a resource.

Any Alternative or New Recommendations on This Agency: RECA respectfully requests that the Sunset Commission review and recommend the adoption of a single plumbing code, the International Plumbing Code for the TSBPE and the state of Texas.

My Comment Will Be Made Public: I agree