



**PLUMBING-HEATING-COOLING
CONTRACTORS ASSOCIATION®**

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February 20, 2023

Regulations Division
Office of General Counsel
Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410-0500

RE: FR-6336-N-01 Request for Information for HUD's Community Development Block Grant Disaster Recovery (CDBG-DR) Rules, Waivers, and Alternative Requirements

Attn: Jessie Handforth Kome, Director

The Plumbing-Heating-Cooling Contractors—National Association (PHCC)¹ appreciates the opportunity to provide comments on HUD's Community Development Block Grant Disaster Recovery Rules, Waivers, and Alternative Requirements. This Association understands the importance of this undertaking and the impacts which may be felt in times of need. In times of crisis, swift action is critical for public safety and the workforce must be mobilized promptly to provide solutions for the affected citizens.

The members of PHCC are the last point of contact with consumers in crisis and, as competent contractors, take seriously the responsibility to protect the health and safety of the American people through the proper installation and maintenance of plumbing, heating, and cooling systems.

PHCC believes that the proposed requirements fail to recognize local constraints. The skilled trades, design professionals, and inspection authorities of the affected areas are all educated to the codes adopted by that jurisdiction. Specifying other codes that were not adopted prior to the disaster would require an administrative overhaul of the education and training for the workforce. Valuable time would be lost before mobilizing workers to help affected families and individuals return to some sense of normalcy.

PHCC—National Association takes a code agnostic approach, the Association believes its members know what codes work best in their area. Maintaining continuity in the application of the codes, particularly in times of crisis, minimize time and money spent on re-training the workforce and will provide fast mobilization of relief efforts for affected citizens. Our particular concern for this pertains to Question 8 in the RFI:

¹ The Plumbing-Heating-Cooling Contractors—National Association (PHCC) is the oldest construction trades association in the country representing approximately 3,200 plumbing and HVACR contractors employing over 64,000 professionals across the United States. Since 1883, this organization has been concerned with the safe installation of plumbing and HVAC systems. PHCC has also maintained a registered apprentice program for over 40 years; PHCC values workforce education and passing our knowledge to the next generation of tradespeople.

8. Modifying Green and Resilient Building Codes and Standards.

a. Should the Department impose construction standards that require the use of CDBG–DR funds to adhere to current editions of the International Building Code (IBC), International Existing Building Code (IEBC), International Residential Code (IRC), International Wildland-Urban Interface Code (IWUIC), International Plumbing Code (IPC), International Mechanical Code (IMC), International Fuel Gas Code (IFGC), International Fire Code (IFC), ICC 500–14, ICC/NSSA Standard on the Design and Construction of Storm Shelters, and ICC 600–14 Standard for Residential Construction in High-wind Regions?

PHCC does not believe that in the aftermath of a disaster the best course of action is a forced update or conversion of codes. Affected individuals might well choose to use advanced technologies or building materials but making a broad mandate will slow the recovery process. As earlier mentioned, training is a key component, but the material supply chain will play a part as well. Wholesale distribution and contractor inventories will be based on adopted codes, moving to alternate code bodies or editions could render locally accessible supplies unusable.

Wisconsin, Kentucky, Massachusetts, and Illinois are four states that adopt their own state plumbing code, codes that are based in a historic consensus-based code approval process. A dozen other states use alternate model plumbing and/or mechanical codes. There are multiple states which let local jurisdictions choose between model codes and several other states allow the use of one national organization's model code for plumbing and different national organization's code for mechanical work.

PHCC members work in these states and have built businesses and developed their workforce in compliance with the codes adopted in their respective jurisdictions. These members are prepared to start recovery work in times of crisis consistent with rigorous jurisdictional code requirements. Please consider revising the proposed requirements to include all model code organizations and state adopted codes for the plumbing and mechanical trades. Doing so will ensure the fastest response when unthinkable actions occur.

Respectfully,

Dave Frame, President
PHCC—National Association