DATE: November 1, 2021

TO: California Buildings Standards Commission
California Department of Housing and Community Development
California General Services Administration, Division of State Architect
California Office of Statewide Health Planning and Development
California Department of Water Resources

SUBJECT: **Title 24 Petition to adopt Uniform Plumbing Code, Appendix M "Peak Water Demand Calculator" into the California Plumbing Code**

The undersigned organizations strongly support a Title 24 Petition to adopt the Uniform Plumbing Code, Appendix M "Peak Water Demand Calculator" (UPC Appendix M) into the California Plumbing Code (Title 24, Part 5 or CPC) as an alternative methodology for sizing water pipes in new single family and multifamily residential buildings.

UPC Appendix M is a peer-reviewed alternative pipe sizing methodology for premise plumbing that was developed in response to the increased prevalence of high-efficiency plumbing fixtures. It is the first major update to plumbing sizing requirements since the 1940's, which is necessary given that water flows are lower today than they were 80 years ago. Other states and local jurisdictions have already taken the lead in adopting UPC Appendix M, including Nevada (2018), North Dakota (2020), Oregon (2021), and City of Seattle and King County, Washington (2021).

California water utilities and other stakeholders will experience a variety of benefits from utilizing UPC Appendix M, including increased water savings, increased energy savings, reductions in cost, and benefits to public health from reduced opportunity for premise plumbing pathogen growth.

We urge approval of the Title 24 Petition to adopt Uniform Plumbing Code, Appendix M "Peak Water Demand Calculator" (UPC Appendix M) into the California Plumbing Code (Title 24, Part 5 or CPC) during the 2022 Intervening Code Cycle.

Thank you for the opportunity to comment on this petition.

TCFleming

Tia Fleming, Co-Executive Director
California Water Efficiency Partnership

[ADD SUPPORTING SIGN ONS]