



**Building Owners & Managers
Association of Pittsburgh**
544 Miltenberger Street
Pittsburgh, PA 15219
BOMAPittsburgh.org

Good Morning Chairman Harhart and members of the Professional Licensure Committee.

My name is Kevin Clarke and I am the Immediate Past President of the Building Owners and Managers Association of Pittsburgh, more commonly known as BOMA and past member of the Pa. State Review and Advisory Committee Collaborative. BOMA Pittsburgh, founded in 1919, is federated with BOMA International (founded in 1906) whose 17,000-plus members own or manage more than ten billion square feet of commercial properties in the US and provide work space for 44 million jobs.

Together with BOMA Philadelphia and BOMA Harrisburg, Pennsylvania BOMA chapters encompass 500 members and represent more than 100 million square feet. The impact of the commercial building industry to Pennsylvania on an annual basis includes contributing over 7 billion dollars to the economy, over 2 billion dollars in new taxable earnings and supports more than 145,387 jobs.

In December 1994, the International Code Council (ICC) was formed by the three U. S. regional code developers with a goal of developing a single set of coordinated codes for the built environment. Utilizing more than 190 years of collective experience, and with a major commitment by BOMA and the other real estate, building and construction industry groups to provide the necessary expertise to assist with the development efforts, the ICC completed the International Codes series in 2000. The new I-Codes replaced the National Codes, Uniform Codes, and Standard Codes previously published by the respective organizations that now constitute the ICC.

BOMA International supports the development and promulgation of national model energy efficiency building codes - the International Code Council's (ICC) International Energy Conservation Code (IECC) and the American Society of Heating, Refrigerating and Air-Conditioning Engineers ASHRAE/IESNA Standard 90.1 Energy Standard for Buildings Except Low-Rise Residential Buildings – that meet the needs of city, state and federal code adopting authorities as well as the commercial real estate industry by the inclusion of only those provisions that are technically feasible, cost-effective, and enforceable to establish minimum efficiency requirements that apply to all newly constructed buildings, and to tenant finish-out, additions and major renovations to existing buildings.

BOMA International continues to be directly and aggressively involved in the development of national model energy codes. BOMA holds an organizational voting member seat on the ASHRAE 90.1 Standing Standards Project Committee and is also a critical voice for commercial real estate industry in the ongoing development of the IECC. BOMA is directly involved in the implementation of these codes at the city,



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state and federal level. Both of these national model energy codes are well established in the marketplace and constitute a far-reaching series of energy efficiency requirements that can be utilized for every type and size of building and are applicable for all 50 states. Each code is intended as a minimum requirement applying to all newly constructed buildings, and to tenant finish-out, additions and major renovations to existing buildings within the jurisdiction of the adopting authority. BOMA has continuously advocated that for any energy code to be acceptable to commercial real estate, basic business investment principles must be observed in the cost justification for any provisions included in the codes. BOMA has also steadfastly held that as buildings and their systems differ considerably in age, size, location, and climate, a "one size fits all" approach to minimum energy efficiency requirements is neither feasible nor cost-effective. BOMA International believes that energy codes applying to existing buildings should not include the same energy efficiency levels that can be designed into newly constructed buildings, and also seeks to preserve flexibility for building owners and their design teams.

BOMA appreciates the opportunity to provide public feedback to the committee and respectfully submit the following comments for the committee's consideration:

- We disagree with the establishment of a Plumbing Board as it will cause an increase to the cost of plumbing services as associated fees and assessments will be passed on to the consumer.
- The proposed Plumbing Board's authority as stated in Section 302.6 is ambiguous and will allow the Board to overreach its authority beyond the laws intent and affect the current code adoption environment delivering confusion in the filed between Architects, designers and contractors.
- We agree that there should governmental oversight on the certification of plumbers and plumbing contractors and recommend the result can easily be achieved by following the existing process currently in place for the construction industry under the office of the Attorney General.

Thank you Madam Chairman and Committee members for the opportunity to present these Comments.

Sincerely,

A handwritten signature in blue ink that reads "Kevin C. Clarke".

Kevin Clarke
Immediate Past President, BOMA Pittsburgh