



April 13, 2026

Alaska House Committee on Finance
State Capitol
120 4th St
Juneau, AK 99801

RE: Comments on House Bill 260

Dear Co-Chairs and Members of the House Finance Committee:

The International Association of Plumbing and Mechanical Officials (IAPMO) appreciates the opportunity to provide comments on the legislation for your committee's consideration, HB 260.

Founded in 1926, IAPMO® is a standards development organization and trade association that produces the most progressive and technically advanced plumbing, mechanical and water-efficiency codes in the world. Its membership includes contractors, engineers, manufacturers, suppliers, plumbing and mechanical inspectors, and building officials, dedicated to protecting the public's health by promoting safe, efficient, and effective plumbing and mechanical systems.

The State of Alaska relies on the Uniform Plumbing Code (UPC) as the foundation of its state plumbing code, demonstrating a long-standing commitment to nationally recognized, science-based safeguards for drinking water, sanitation, and building safety. It is considered the industry gold standard and is the only plumbing code accredited by the American National Standards Institute, ensuring the highest standards for openness, balance, consensus, and due process in its development.

Given Alaska's vast and remote geography, its reliance on fuel-burning heating appliances, and the unique engineering demands of a subarctic climate, maintaining a modern, resilient plumbing code is especially critical to protecting public health. The risks posed by inadequate plumbing systems are not theoretical -- they are documented extensively in national public health data, and Alaska residents face some of the nation's most acute exposure to several of these hazards.

- Carbon monoxide (CO) poisoning from fuel-burning plumbing appliances -- including gas water heaters and boilers -- is among the most serious. According to the Centers for Disease Control and Prevention (CDC), more than 400 Americans die annually from unintentional CO poisoning unrelated to fires, more than 100,000 visit emergency rooms, and more than 14,000 are hospitalized each year.¹ CDC and U.S. Consumer Product Safety Commission data show that between 2016 and 2020, Alaska had the highest death rate from accidental non-fire carbon monoxide poisoning of any state in the nation.² **The UPC's requirements governing the installation and ventilation of water heaters and fuel-burning appliances -- requirements verified through the work of licensed plumbing professionals -- are a primary safeguard against this preventable cause of death.**
- Legionnaires' disease, a severe and potentially fatal pneumonia caused by Legionella bacteria that colonize improperly maintained hot-water systems, is the leading cause of reported drinking water disease outbreaks in the United States.³ The CDC reports approximately 6,000 confirmed cases annually, though the most recent population-based study estimated 8,000 to 18,000

¹ Centers for Disease Control and Prevention, Carbon Monoxide Poisoning Factsheet, <https://www.cdc.gov/carbonmonoxide/factsheet.html>

² Centers for Disease Control and Prevention National Center for Health Statistics (CDC WONDER) and U.S. Consumer Product Safety Commission, carbon monoxide mortality data, 2016–2020

³ Centers for Disease Control and Prevention, Legionnaires' Disease Surveillance and Outbreak Data, <https://www.cdc.gov/legionella>

hospitalizations per year, with a case fatality rate of approximately ten percent.⁴ Legionella proliferates in plumbing systems that are improperly designed or maintained at incorrect temperatures, conditions the UPC directly addresses. IAPMO is the only code development organization to convene a dedicated Legionella Task Group, and **the 2021 UPC added a specific appendix on water temperature and Legionella risk -- reflecting the code's continuous, science-driven evolution.**⁵

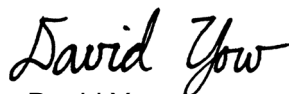
- Cross-connections -- points where potable and nonpotable water supplies can intermingle through backflow -- present a third category of pervasive risk. U.S. Environmental Protection Agency-funded research found that nearly 96 percent of surveyed homes had cross-connections to health hazards, and that on average 73 percent of household water uses were unprotected.⁶ CDC surveillance documented 57 waterborne disease outbreaks attributable to cross-connections between 1981 and 1998, resulting in nearly ten thousand illnesses.⁷ **Properly installed backflow prevention devices, specified and verified by trained, licensed plumbers applying the UPC, are the essential safeguard.**

The specific provisions of the UPC matter in ways that are acutely relevant to Alaska's conditions. The UPC's resiliency provisions are specifically designed to exceed minimums in areas of freeze protection and pipe burial depth requirements, which matters a great deal in a state where frost penetrates far deeper than anywhere else in the nation. The UPC is a single, comprehensive, self-contained codebook covering all installation types, from residential to commercial. This "turn-key" design is particularly valuable in remote Alaskan communities where a plumber in the field may not have ready access to multiple reference volumes. The UPC is also the only plumbing code to include dedicated Appliance Venting and Combustion Air Provisions -- a chapter with direct life-safety consequences in Alaska's climate -- and the only code to include the Water Demand Calculator, a statistically validated tool for rightsizing plumbing systems. These benefits reflect the UPC's foundational orientation toward the most challenging real-world conditions, and they represent specific protections that Alaskan enjoy today.

However, none of these protections are self-executing. They depend entirely on qualified professionals -- journeyman plumbers and plumbing contractors who have completed rigorous apprenticeships, passed state examinations, and committed to continuing education -- who bring to each installation the training needed to apply the UPC's requirements correctly and the professional accountability to do so reliably. The UPC and the workforce that implements it are inseparable components of Alaska's public health infrastructure. A code is only as strong as the professionals who carry it into the field, and that protection can never be taken for granted.

IAPMO supports efficient and cohesive adoption of building codes for the public health and safety of Alaskans. For any additional assistance or information, please contact me at david.yow@iapmo.org.

Sincerely,



David Yow
IAPMO Director of Government Relations

Cc: The Hon. Andy Josephson

⁴ Collier, S. A., et al., "Estimate of Burden of Legionnaires' Disease, United States," *Clinical Infectious Diseases* 66, no. 11 (2018): 1625–1632

⁵ International Association of Plumbing and Mechanical Officials, *Uniform Plumbing Code, 2021 Edition, Appendix N*

⁶ U.S. Environmental Protection Agency, *Cross-Connection Control Manual (EPA 816-R-03-002)*, <https://www.epa.gov/sites/default/files/2015-09/documents/epa816r03002.pdf>

⁷ Craun, G. F., et al., "Waterborne Disease Outbreaks in the United States," *Journal of Water and Health / CDC surveillance summaries*, 1981–1998