

Keeler, Erika

From: Walls, Dave
Sent: Saturday, October 10, 2009 8:34 AM
To: Nearman, Michael; Keeler, Erika
Cc: Davis, Stephanie
Subject: FW: 45 comment period regarding greywater regulations

[comment](#)

From: Adler, Bob [mailto:Bob.Adler@sanjoseca.gov]
Sent: Friday, October 09, 2009 4:48 PM
To: CBSC (General Mail)
Cc: Doug Hensel; Walls, Dave; Davis, Stephanie
Subject: 45 comment period regarding greywater regulations

I would like to offer two comments:

1. 1601A.0 Graywater Systems – General – Section D, Exception, which allows the installation of a clothes washer and/or a single fixture system to be completed without a permit. This is simply not acceptable. Based on past requirements it is no wonder so many people abhor the thought of getting a permit for work on their house. But please consider the implications of allowing the general public to alter their plumbing system without some supervision. If there are some among you who believe that well intentioned people can simply just do the right thing and make a safe, healthy installation, you are sadly mistaken. As a long time plumber and inspector I've had the experience many times over of poorly designed and installed plumbing. An improperly trapped and vented fixture can allow sewer gasses into the house as well as unsanitary water to be dumped onto the ground. Without supervision many people will do as they please. I am not suggesting to disregard the emergency condition we are facing regarding the State's water shortage and to throw out the rules promulgated by these express terms. What I am advocating is make getting a permit the requirement and allow the exception to not require it if the local Jurisdiction so chooses. By doing it the way you've proposed, it becomes more difficult for the local enforcing jurisdiction to implement governing regulations. What would make more sense would be to propose a simple and very inexpensive permit to assure a single inspection of these systems. Also, keep in mind the number of slum-lords who would just jump at the opportunity to legally dump their water into the backyard.
2. 1601A.0 Graywater Systems – General – Section H, which reads in part, that the discharge point of any graywater irrigation or disposal shall be covered by at least 2 inches of mulch. This is simply not an adequate ground cover. Children, animals and anyone using the backyard of such an area is at risk of serious contamination. Two inches is simply not enough cover to protect. Mulch can be easily displaced and possibly even blown away. Animals can drink and kids can play in the mud puddle. Better would be to bury it a foot below the surface or, at the very least, the root level of the plants being served by the graywater.

Thank you for your time and attention: Please strongly consider the above comments before finalizing the graywater rules. The State is charged with protecting the general public's well-being. The rules as proposed by the express terms do not do that.

Bob Adler