



San Diego County Water Authority

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May 21, 2015

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California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, California 95833

RE: Adoption of Emergency Building Standards for the Department of Housing and Community Development Regarding the 2013 Green Building Standards Codes (May 29, 2015 proposed adoption)

To Whom It May Concern:

The San Diego County Water Authority is a wholesale water agency supplying 24 member agencies in San Diego County. We have a strong interest in ensuring efficient water use by existing and future water customers and would like to comment on the emergency regulations proposed for consideration by the Building Standards Commission on May 29, 2015.

Our member agencies are currently subject to State Water Resources Control Board emergency conservation regulations that will require a reduction of 12 to 36 percent in urban water use for retail agencies in the San Diego Region. This regulation places a significant burden on existing customers to reduce their water use, and in many cases existing customers may have restrictions that result in an inability to maintain their current lawns and landscaping. To have some parity with existing customers, we recommend that new construction be held to the highest standards in water use efficiency. For this reason, in addition to the proposed reduction in water budget associated with landscape design, we are recommending that the revised building standards include a prohibition on all ornamental turf, including ornamental turf used in front lawns, commercial settings and street medians. Allowable turf should be limited to recreational settings, places of assembly, and residential back or side yards.

The proposed regulations, Section 5.304.5, will require the installation of sub-meters for new landscape or landscape modifications for landscaped areas greater than 1,000 square feet, but not more than 5,000 square feet. Please be aware that water agencies do not have responsibility or authority beyond the agency water meter to read or maintain any sub-meters. It is not likely that individual homeowners will read or maintain these meters. Therefore, we do not see a high value for the installation of sub-meters on properties with less than 5,000 square feet of landscape and recommend that this requirement be removed from the regulations.

OTHER REPRESENTATIVE

County of San Diego

A public agency providing a safe and reliable water supply to the San Diego region

Water suppliers are interested in protecting the public water system from inadvertent on-site cross-connections. Section 5.304.2 1.a. allows use of captured rainwater, recycled or graywater designed per the *California Plumbing Code*. This section also allows the use of potable water as a back-up supply for on-site water recycling and reuse. At the same, the *California Plumbing Code* is explicit in that no cross-connections between the potable and non-potable system are allowed.

Section 5.304.2 should be clear that potable water may be used as a back-up supply only when the potable water is delivered to the non-potable system through an on-site air gap separation. We recommend that the on-site air gap requirement be added to the regulation. Please be aware that, consistent with Title 17, CCR Section 6704, where auxiliary water supplies are used on site, the water supplier will require a reduced pressure backflow device at the meter. Where there is a direct connection between the potable water and the auxiliary water supply, the water supplier will require an air gap separation at the water meter.

Thank you for the opportunity to comment on these proposed changes to the regulations. If you have any questions regarding this letter, please contact Toby Roy at (858) 522-6743

Sincerely,



Ken Weinberg
Director of Water Resources