

STATE OF CALIFORNIA  
STATE AND CONSUMER SERVICES AGENCY  
CALIFORNIA BUILDING STANDARDS COMMISSION  
2525 NATOMAS PARK DR., SUITE 130  
SACRAMENTO, CA 95833  
(916) 263-0916 Phone  
(916) 263-0959 Fax  
Email: [cbsc@dgs.ca.gov](mailto:cbsc@dgs.ca.gov)

Office Use Item No. \_\_\_\_\_

**PARTICIPATION COMMENTS FOR THE NOTICES DATED APRIL 22, 2011**  
Written comments are to be sent to the above address.

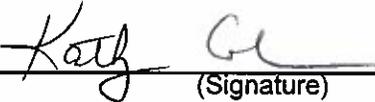
**WRITTEN COMMENT DEADLINE: JUNE 6, 2011**

Date: 04/29/11

From:

Kathy Cole

Name (Print or type)

  
(Signature)

Metropolitan Water District of Southern California

Agency, jurisdiction, chapter, company, association, individual, etc.

700 N. Alameda Street, Los Angeles, CA 90012

Street

City

State

Zip

I/We (do)(do not) agree with:

The Agency proposed modifications As Submitted on Section No. 1-209(d)(2) and (6)

and request that this section or reference provision be recommended:

Approved     Disapproved     Held for Further Study     Approved as Amended

**Suggested Revisions to the Text of the Regulations:**

**Reason:** [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA



April 29, 2011

Mr. Dave Walls  
Executive Director  
California Building Standards Commission  
2525 Natomas Park Dr., Suite 130  
Sacramento, CA 95833

**RE: Proposed Administrative Regulations of the California Building Standards Commission**

Dear Mr. Walls:

The Metropolitan Water District of Southern California (Metropolitan) and the California Municipal Utilities Association (CMUA) respectfully submit comments to the proposed regulatory changes to the California Administrative Code (Part 1 of Title 24, California Code of Regulations). We appreciate the inclusion of water expertise in the Plumbing, Electrical, Mechanical and Energy and Green Building Code Advisory Committees as shown in Article 2, Section 1-209(d)(2) and (6). However, we want to ensure that the term "Local Water Supply Official" will be interpreted by the California Building Standards Commission to mean an individual who has official standing within a local jurisdiction and is knowledgeable and experienced in both state and local water efficiency codes and programs.

The term "Local Water Supply Official" appears to be a newly instituted term, as we are unaware of any reference to the term in the existing codes or local government practices. The terms "Local Government Building Official" and "Fire Official" are widely interpreted to mean an individual who has an official position within a local jurisdiction that is responsible for ensuring compliance with state and local codes. Therefore, we are requesting that the Commission apply the same standard to the individuals who would provide water expertise on the two advisory committees. Water use efficiency is becoming increasingly important within building structures, and it is essential that individuals appointed to these positions have the requisite qualifications.

Metropolitan and CMUA wish to express our sincere thanks for working with us over the course of the past year on seeking this important inclusion within the Title 24 Administrative Code. We firmly believe that this change will better facilitate implementable standards for water efficient devices and systems used in public and private buildings and residences throughout the state. Importantly, it will directly assist California in meeting its statutorily defined urban water use reduction of 20 percent by 2020.

Again, thank you for the opportunity to provide our comments for your further consideration. Should you have any questions or concerns, please do not hesitate to contact either one of us.

Sincerely,

Kathy Cole  
Metropolitan Water District  
of Southern California  
(916)650-2600

Jennifer West  
California Municipal Utilities Association  
(916) 326 -5800

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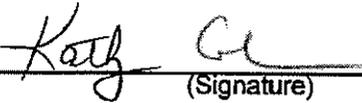
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## HEALTH & SAFETY CODE SECTION 18930

### SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
  - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
  - (3) The public interest requires the adoption of the building standards.
  - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
  - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
  - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
  - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
    - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
    - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
  - (8) The format of the proposed building standards is consistent with that adopted by the commission.
  - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.



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