



June 2, 2011

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

RE: Proposed Administrative Regulations of the California Building Standards Commission

Dear Mr. Walls:

The WaterReuse Association of California (WRA) respectfully submits comments to the proposed regulatory changes to the California Administrative Code (Part 1 of Title 24, California Code of Regulations). As the primary representative of the state’s water recycling entities, 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.

As noted by others, the term “Local Water Supply Official” appears to be a newly instituted term without reference 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.

WRA thanks the Commission for working with us over the course of the past year on seeking this important inclusion within the Title 24 Administrative Code. 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, please do not hesitate to contact us.

Sincerely,


Dave Smith, Ph.D, Managing Director
WaterReuse California

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