



**Mosquito and Vector Control  
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California Building Standards Commission  
Attention: Jim McGowan, Executive Director  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

**Re: Comments on the 2013 California Plumbing Code**

Dear Mr. McGowan:

The Mosquito and Vector Control Association of California (MVCAC) wishes to provide comments and support with regards to the notice of proposed action amending building standards of the Department of Housing and Community Development regarding the 2013 California Plumbing Code, California Code of Regulations, Title 24, Part 5, which amends and adds language to protect the public from mosquitoes, rodents and other potential vectors of disease:

Gray water-

**1602.9.2 Animals and Insects.** *Gray water tank openings shall be protected to prevent the entrance of insects, birds, or rodents into the tank and piping systems. Screens installed on vent pipes, inlets, and overflow pipes shall have an aperture of not greater than 1/16 of an inch (1.6mm) and shall be close fitting.*

Rainwater-

**1702.9.5.6(A) Animals and Insects.** Rainwater tank openings shall be protected to prevent the entrance of insects, birds, or rodents into the tank *and piping systems. Screens installed on vent pipes, inlets, and overflow pipes shall have an aperture of not greater than 1/16 of an inch (1.6mm) and shall be close fitting.*

MVCAC supports the Rainwater Capture Act and other efforts to reduce the need and dependency of California's water supply, especially reusing water that otherwise would have been lost. **However, without the added amendments listed above, thousands of potential mosquito-breeding sites could be installed. Every unscreened rainwater/gray water capture device has the possibility of producing hundreds of thousands if not millions of mosquitoes.** The primary vector of West Nile virus prefers to breed in man-made containers such as these. It is expected that if installed without the screens listed above, these containers would create a significant public health nuisance and very possibly a public health threat.

Thank you for your consideration and this opportunity to comment.

Respectfully,

Ken Bayless  
President