

**FINAL STATEMENT OF REASONS  
FOR  
PROPOSED BUILDING STANDARDS  
OF THE  
DEPARTMENT OF WATER RESOURCES  
REGARDING THE 2010 CALIFORNIA PLUMBING CODE (CPC)  
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 5**

The Administrative Procedure Act requires that every agency shall maintain a file of each rulemaking that shall be deemed to be the record for that rulemaking proceeding. The rulemaking file shall include a final statement of reasons. The Final Statement of Reasons shall be available to the public upon request when rulemaking action is being undertaken. The following are the reasons for proposing this particular rulemaking action:

**UPDATES TO THE INITIAL STATEMENT OF REASONS:**

The Department of Water Resources (DWR) finds that one revision has been made which would warrant a change to the initial statement of reasons. Senate Bill 283 was signed into law (Water Code §13557, amended by Stats. 2009, Ch. 178 [S.B. 283, DeSaulnier]), which gives DWR the responsibility to adopt and update Chapter 16A Part II of the California Plumbing Code Title 24, Part 5.

Water Code §13557, amended by Stats. 2009, Ch. 178 (S.B. 283, DeSaulnier) requires the Department of Water Resources, in consultation with the State Department of Public Health, to adopt and submit to the California Building Standards Commission regulations to establish a state version of a dual plumbing code to provide design standards to safely plumb buildings with both potable and recycled water systems.

**MANDATE ON LOCAL AGENCIES OR SCHOOL DISTRICTS**

The DWR has determined that the proposed regulatory action would not impose a mandate on local agencies or school districts.

The DWR finds that the mandate IS NOT reimbursable.

These changes to the plumbing code set out the specifications to safely plumb buildings with both potable and recycled water systems. The installation of dual plumbing is voluntary.

**OBJECTIONS OR RECOMMENDATIONS MADE REGARDING THE PROPOSED REGULATION(S).**

DWR received the public comments as noted below:

**Letters in support of the code as presented:**

Metropolitan Water District of Southern California  
Los Angeles, California

WaterReuse Association  
Sacramento, California

Public  
Mission Viejo, California

**SECTION 1613A.0 Recycled Water Systems – General (A)**

**Commenter:**

Dublin San Ramon Services District  
Dublin, California

The commenter recommends that words be added to further delineate an initial test as one in which pipes have never yet contained recycled water. The commenter also wants the initial test to be run using a backflow prevention device.

**DWR Response:**

DWR is not proposing changes to Section 1613A.0 at this time. Such additional details are left to the discretion of the local governing authority or Authority Having Jurisdiction.

**SECTION 1620A.0 Inspection and Testing (B)(2)**

**Commenter:**

Dublin San Ramon Services District  
Dublin, California

The commenter recommends that cross-connection tests be performed by “certified cross-connection control specialist(s)”.

**DWR Response:**

DWR is not proposing changes to Section 1620A.0 (B)(2) at this time. Such additional details are left to the discretion of the local governing authority or Authority Having Jurisdiction.

**DETERMINATION OF ALTERNATIVES CONSIDERED AND EFFECT ON PRIVATE PERSONS**

The Department of Water Resources has determined that no alternative considered would be more effective in carrying out the purpose for which the regulation is proposed or would be as effective as and less burdensome to affected private persons than the adopted regulation.

**REJECTED PROPOSED ALTERNATIVE THAT WOULD LESSEN THE ADVERSE ECONOMIC IMPACT ON SMALL BUSINESSES:**

No alternatives were proposed. DWR has determined that the proposed regulations will not have an adverse economic impact on small businesses.