

Recycled Water Comments submitted from the CALBO State Codes Committee to BSC and HCD.

Doc #1 (BSC Part 5)

- The definition for Recycled Water System should be consistent with HCD. We don't know which the best is, but they should match.
- Section 1501.10 Commercial, Industrial, Institutional, and Residential Restroom Signs. This section should require a sign on the outside and inside of the tank. In our opinion the outside is more valuable if only one sign is desired. We don't think many folks pay attention to what is written on the inside of the tank.
- Section 1501.10.2, Outdoor Signs should be revised to provide more guidance on the number and location of the signs. Some sites have multiple access points.

Doc #2 (BSC Part 11)

- Although the exceptions in Section 5.305.1 follow the text in AB 2282, this section should be clear about where the use of recycled water or the installation of piping is required. The charging language only indicates compliance with the plumbing code. The exceptions should be minimized to just say the use of recycled water is required unless they are exempt because the water services agency has determined otherwise. There should be no reference to "local enforcing agency" because in most codes that ends up being the building department. Consider using something similar to HCD's proposal for Section 1503.1.1 with removal of AHJ, in this case, it should be specific to the water authority.

Doc #3 (HCD Part 5)

- The definition for Recycled Water System should be consistent with BSC. We don't know which the best is but they should match.
- Section 1501.7 Minimum Water Quality Requirements. The last sentence can be removed. The next two sections state the water quality requirements; we don't think there needs to be a reference to them in the charging paragraph. Please confirm that the reason HCD1 is removed from Section 1501.7 is because the specific requirements are now in 1501.7.1 and 1501.7.2. This section should probably match BSC, Section 1501.7.
- Section 1501.10 Commercial, Industrial, Institutional, and Residential Restroom Signs. This section should require a sign on the outside and inside of the tank. In our opinion the outside is more valuable if only one sign is desired. We don't think many folks pay attention to what is written on the inside of the tank. In addition, the sign should probably indicate no use for washing or cleansing. This comment is related to the discussion about bidet seats and lavy tank tops installed by folks that may not understand what recycled water is.
- Section 1501.10.2, Outdoor Signs should be revised to provide more guidance on the number and location of the signs. Some sites have multiple access points or unlimited access that is not clearly defined. A consideration may be to say, a sign is required where ever contact with recycled water is possible. We

understand this is a tough section to write. However, it needs to be as clear as possible for the installers and the enforcers.

- Section 1503.1 & 1503.1.1, remove reference to AHJ and say the water authority or something similar. AHJ is very broad and can cover multiple entities within a jurisdiction. If necessary create a new definition to ensure that it is clear that this is a call that needs to be made by the water authority, not the building department. Although we understand why the code use AHJ, we do not see any reason to not be very specific in this section about who determines the requirement.
- Section 1503.9, if new homes are built and recycled water is required to be provided, this section would require an irrigation system to use the water since it cannot be provided by a hose bibb.