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June 11, 2012

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San Francisco Public Utilities Commission
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Dear Commissioners:

Secretary
Mary McCue

We are writing to support the non-potable water ordinance and the SFPUC's accompanying grant program being introduced on June 12. The new ordinance will codify a process for voluntary early adopters to design, install, and permit onsite water treatment systems in San Francisco. Such systems capture, treat, and reuse water generated on site— such as graywater, blackwater, and foundation drainage—for non-potable uses such as toilet flushing and irrigation. Onsite treatment systems can save significant amounts of water—between 20-75 percent of potable water in mixed use and commercial buildings—and contribute to the city's water conservation goals, which SPUR strongly supports.

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Currently, there are no regulations in place to define this permitting process, yet several city agencies including the SFPUC, Department of Building Inspection and Department of Public Health, are all involved. A better process will improve the likelihood that developers will consider and new buildings in San Francisco will include onsite treatment systems. SPUR supports matching water sources to appropriate uses; we should be moving away from using pristine Hetch Hetchy water for toilet flushing. The ordinance will also protect public health by establishing water quality criteria and compliance assurance through monitoring and inspections.

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We also support the proposed pilot grant program to create incentives to install these cutting-edge onsite treatment systems by helping to offset some of their costs. The grants are reserved for large projects that will save significant amounts of potable water, at least 40% of water use. By making this small public investment, the city will get valuable information and experience with how these systems perform, and can better ascertain costs and actual water savings going forward. We are hopeful that that information could allow us to consider mandatory onsite treatment, or adopt a bigger grant program, for large projects sometime in the future.

Sincerely,

Laura Tam
Sustainable Development Policy Director