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September 8, 2021

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**Subject: Agenda Item 5, September 9, 2021, Public Safety and
Neighborhood Services Committee (File # 210536); Proposal for
Expansion of Requirements for Alternate Water Sources
for Non-Potable Applications**

Dear Mr. Carlin and Mr. Bintliff,

I am writing on behalf of the California State Pipe Trades Council and Plumbers and Pipefitters UA Local 38 in strong support of adoption of proposed Ordinance 210536 - Alternate Water Sources for Non-Potable Applications. Among other actions, the proposed ordinance amends the City Health Code to (1) lower the threshold from 250,000 to 100,000 square feet of gross floor area for requiring that new buildings be constructed, operated, and maintained using specified alternate water sources for required non-potable uses; (2) exempt certain affordable housing

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projects and property uses from that requirement; (3) require that certain categories of new buildings use specific sources of non-potable water for specific purposes; and (4) requires completion of reports on purified water, recycled water, and Non-potable District Systems.

This proposal before you was developed pursuant to Section 909, subdivision (c) of Ordinance 200701 (All-Electric Building Standard), which requires: “Concurrent with implementation of the All-Electric building requirement, the San Francisco Public Utilities Commission will evaluate opportunities for the expansion of non-potable onsite water treatment systems, graywater heat recovery systems, and solar thermal water heating, and shall present findings and recommendations to the Board of Supervisors by no later than March 1, 2021.”

The California State Pipe Trades Council and UA Local 38 would like to thank Supervisor Mandelman for his leadership in moving this ordinance forward, along with the co-sponsors, Supervisors Mar, Malgar and Ronen. We would also like to thank the leadership and staff at the SFPUC and the San Francisco Department of Environment. In particular, Michael Carlin, Paula Kehoe, John Scarpulla, Barry Hooper and Cyndy Comerford have been invaluable in identifying a pathway to expand the City’s water re-use requirements in a reasonable and feasible way.

We look forward to continued collaboration with the City particularly as it seeks to identify and implement recommendations from the reports required under this ordinance related to expansion of the City’s recycled water treatment facilities and purple water district maps, renewable gas pilot projects and opportunities to implement more efficient water pre-heating technologies such as thermal solar systems, geothermal hot water systems, and gray/wastewater pre-heating systems.

In addition, we would like to thank Sierra Club, NRDC and Blue Green Alliance for their longstanding work on water conservation issues and their recognition of the natural relationship between building decarbonization efforts and building water efficiency efforts. We would also like to thank them for their commitment to recognizing the need to identify a just transition path where greenhouse gas reduction policies inequitably impact certain classes of workers.

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Currently 100% of California is experiencing drought conditions, with 96% of the state in severe drought conditions and 88% in extreme drought conditions.¹ California Reservoirs, such as Lake Oroville are at historic low levels. Reservoirs fed by the Colorado River have also fallen to historically low levels.² Droughts of this severity are expected to increase in frequency as a result of climate change.

The California Department of Water Resources recently released a report finding that “Climate change is expected to affect California’s water supply conditions over the long term, with a significant impact being reduction in mountain snowpack.”³ The Governor’s Office of Planning and Research, the California Energy Commission, and the California Natural Resources Agency released their Fourth Climate Change Assessment in 2018, which concluded that “**[b]y 2050, the average water supply from snowpack is projected to decline to 2/3 from historical levels.** If emissions reductions do not occur, water from snowpack could fall to less than 1/3 of historical levels by 2100.”⁴ The Public Policy Institute of California, a non-profit non-partisan think tank noted “California’s climate is warming and becoming more variable. **Rising temperatures are making droughts more intense, and dry years are occurring more frequently.**”⁵

Water reuse is one of the most efficient and cost-effective ways to improve drought resilience in California. Currently, most buildings use potable water to supply the non-potable water demands from toilet and urinal flushing, floor trap priming, cooling towers, and air-conditioning devices. Dual plumbing of buildings allows those non-potable water demands to be met by non-potable water sources such as recycled water or onsite-treated graywater, rainwater and foundation drainage. Onsite treatment and reuse of available onsite rainwater, graywater and foundation drainage in buildings provides a proven avenue for reducing the use of potable water in non-potable water building applications where recycled water is not available for such uses. Water reuse also reduces long term operational costs for a building, particularly as potable water costs rise with supplies not meeting demand. This reduction in annual utility costs particularly benefits owners and tenants of multi-family affordable housing units.

¹ <https://www.drought.gov/states/california>.

² <https://www.dailymail.co.uk/news/article-9962047/California-droughts-reduce-Lake-Oroville-levels-historic-low-24-cent-capacity.html>.

³ DWR: Drought in California 2021 at p. 10.

⁴ California’s Fourth Climate Change Assessment, summary brochure pg.5, https://www.energy.ca.gov/sites/default/files/2019-11/20180827_Summary_Brochure_ADA.pdf

⁵ [Public Policy Institute. Water and a Changing Climate at p. 1-2.](#)

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The City's current mandates to re-use graywater and wastewater in order to reduce water demand are no longer sufficient. The SFPUC has estimated that the proposed changes in this ordinance could double the amount of water savings in residential and mixed-use buildings to 30% of total indoor potable water demand and offset up to 75% of total indoor potable water demand in commercial buildings, up from the 15% conserved under current requirements. These additional savings would offset the water use of roughly 5,500 San Francisco residents per day.

This ordinance not only expands those water reuse requirements it also provides the dual benefit of ensuring that plumbers who may lose jobs due to building electrification mandates are provided a just transition. This ordinance fulfills the promise of a new green economy by replacing lost jobs installing gas piping with new plumbing jobs making buildings drought resistant. Adopting water-reuse requirements concurrently with building electrification requirements reduces impacts on workers at minimal additional cost to builders. Where gas piping is eliminated, dual piping for non-potable water uses will be installed in its place.

This ordinance is a major step forward for San Francisco in creating buildings for the 21st century that are less greenhouse gas intensive, are drought-resistant, and continue to provide good jobs for plumbers and other construction workers in San Francisco. The California State Pipe Trades Council and UA Local 38 respectfully urges adoption of this ordinance.

Sincerely,



Thomas A. Enslow

TAE:lj

cc: Jacob Bintliff, jacob.bintliff@sfgov.org