

September __, 2013

Mr. Stephen W. Calhoun
Regulatory Coordinator
Department of Housing and Community Development
600 East Main Street, Suite 300
Richmond, VA 23219

RE: Proposed Regulation Amending the Virginia Uniform Statewide Building Code, 13VAC5-63-210 R (72) and 13VAC5-63-320 (19), Rainwater Non-Potable Water Systems.

Dear Mr. Calhoun:

The Hampton Roads Planning District Commission (HRPDC) supports the provisions for rainwater non-potable water systems as set forth in the proposed regulation amending the Virginia Uniform Statewide Building Code, 13VAC5-63-210 R (75) and 13VAC5-63-320 (19). The proposed amendments will allow wider use of rainwater harvesting in voluntary green building applications to reduce or eliminate stormwater runoff through low impact development practices. The capture and use of rainwater reduces the environmental impact of development and protects the quality of streams and local waterways.

In areas where stormwater runoff cannot be infiltrated on site, the use of rainwater harvesting as a stormwater best management practice and as a source of non-potable water can create financial incentives for otherwise nonviable projects. In these cases, the cost of installing and maintaining a rainwater harvesting system may be offset by savings from downsized stormwater infrastructure and reduced potable water use. The proposed amendments will allow local governments to achieve development needs and project compliance with stormwater regulations while promoting environmental quality and sustainability goals.

In future updates to this section of the Virginia Uniform Statewide Building Code, HRPDC urges the Department of Housing and Community Development to continue coordination with the Department of Health and the Department of Environmental Quality to ensure that public health and environmental concerns are vetted through the code change process.

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If you have any questions, please do not hesitate to contact Whitney Katchmark, HRPDC Principal Water Resources Engineer, at (757) 366-4342 or wkatchmark@hrpdcva.gov.

Sincerely,

Dwight L. Farmer
Executive Director/Secretary

TS/jc