



“Protecting the Rivanna River Watershed: A Confluence of Interests”

March 25, 2008

Office of the Governor
Patrick Henry Building, 3rd Floor
1111 East Broad Street
Richmond, Virginia 23219

Dear Governor Kaine:

The Rivanna River Basin Commission (RRBC) requests that the Virginia Department of Health develop guidelines for the use of rainwater.

The recently formed RRBC is a public-private partnership charged with addressing region-wide water issues. Two critical issues facing the Rivanna Watershed and Virginia in general, are (1) planning for water supply to meet increasing demands and (2) an increased need for effective stormwater management due to rapidly changing land uses. Widespread use of “rainwater harvesting” has the potential to address both of these issues.

Elaborate engineering solutions are typically used to convey runoff from rooftops to structures designed to slow its release to streams. This same water is often collected far downstream and, through reservoirs and pipelines, conveyed back to provide water to the building from which it originated. Harvesting rainwater at the source offers a simple, sustainable alternative water supply for indoor and/or outdoor use. At the same time, it protects our waterways from the impacts of large volumes of stormwater runoff from buildings.

The following section in the Code of Virginia directed the Virginia Department of Health to develop guidelines for the use of rainwater:

§ 32.1-248.2. Use of rainwater and reuse of gray water.

A. The Department shall develop by January 1, 1999, guidelines regarding the use of gray water and rainwater. The guidelines shall describe the conditions under which gray water and rainwater may appropriately be used and for what purposes. The guidelines shall include categories of used water, such as types of used household water and used water from businesses, which are appropriate for reuse. The guidelines shall include a definition of gray water that does not include used toilet water.

B. The Department, in conjunction with the Department of Environmental Quality, shall promote the use of rainwater and reuse of gray water as means to reduce fresh water consumption, ease demands on public treatment works and water supply systems, and promote conservation.

(1998, c. 155.)

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It is our understanding that, while guidelines have been developed for the *reuse* of *gray* water, *direct use* of *rainwater* has not yet been addressed by the VDH.

The RRBC urges the VDH to conform to this Code section by developing statewide guidelines that detail acceptable collection and treatment techniques for both the indoor and outdoor use of rainwater. This would provide a framework for localities to actively promote such systems. Currently, there is much confusion on the local level about what is allowed and what design criteria should be used in rainwater harvesting systems.

Many countries utilize rainwater harvesting as their primary source of water. Harvesting rainwater reduces demand for surface and groundwater and protects the integrity of streams. At the same time, it also provides a sustainable, decentralized source of water that encourages conservation. Health Department guidelines are crucial for progress on this use of a significant renewable natural resource.

Sincerely,

Sally Thomas, Chair

cc: Karen Remley, MD, MBA, FAAP, State Health Commissioner
Jim Burns, MD, MBA, Deputy Commissioner for Public Health
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