

July 2, 2007

Board Of State Examiners Of Plumbers & Gas Fitters
239 Causeway St.
Boston, Mass. 02114

Re, variance request Natick Mall

Dear Chairman and Board Members,

I urge you to table the final vote for the variance request for the Natick Mall until further review. Toilet facilities are required in tenant spaces contained in a covered mall. And so are service sinks.

I was personally involved in detailed discussions on this section with the previous administration and board, during the onset of potty parody in the mid nineties. Many understood this section needed to be reworded, but also came to a consensus of what the true intent was regardless of the wording. Just one example, i5 will state “ where only one person is employed or works” this statement is ambiguous to say the least. Any retail space no matter what size could simply say only one person is going to work here. In fact I have had builders argue this point with me to try to get away with not installing proper toilet rooms. The true intent for that wording is for guard shacks or kiosks where truly only one person can work. This is just one example, unfortunately we never got around to rewriting that section, due to circumstances.

Although section 10.10, 18, l also refers to 10.10, 18, i, this can be a very difficult section to understand. It contains some so called “gray areas” and is subject to different interpretations. However the benefit of doubt must always side with the true intent and spirit of our code. For section 10.10, 18 that is to provide proper and adequate toilet facilities, for the health, safety, and comfort for all people. That’s all people, public, private, employees, children, the elderly, and disabled.

Also more consideration should have been given to the Plumbing Inspector of the Town of Natick, who has 27 years of experience. Other than some code consultant that has limited experience with our code, not to mention is working for the builder.

Sincerely,

Joseph P. Guzzo, Plumbing Inspector