Date: February 2, 2026

To: Mayor, City Council, City Manager, City Attorney
From: Mike Scott

Re: Questions about proposed Chapter 4 changes (Backflow & Cross Connections)

The following questions arose from my review of the proposed Chapter 4 updates. While prompted by this specific ordinance, I believe they reflect a broader set of questions that are useful whenever we consider changes to city code.

As we evaluate this chapter, I believe it is important that we take time to understand what is required under state or other adopted codes and what we are choosing to impose locally, and consider how those decisions affect residents, property owners, and builders.

At the same time, when chapters come forward for updates, we have an opportunity to improve clarity, reduce duplication, eliminate outdated provisions, and streamline language where possible. Clearer, more focused code benefits staff, the public, and enforcement.

1. "Higher-Level" Requirements
Are any provisions in Chapter 4 already required under state or federal drinking water laws or plumbing codes that Ivins must enforce? If so, which portions of this chapter are mandated by: Utah Division of Drinking Water, International Plumbing Code (as adopted by the state), other?

2. Why Restate Those Requirements Locally?
If some of these requirements are already "higher level" requirements, why do we restate them in city code rather than referencing those higher-level regulations? Is this done for enforcement authority? For clarity to local users? Or is it simply legacy drafting and unnecessary?

3. Ivins-Specific Requirements
Which provisions go beyond what state law or adopted plumbing codes require? In other words, where is Ivins exercising local discretion rather than implementing a mandated standard?

4. Justification for Local Additions
For any requirements that exceed "higher level" requirements: What local conditions or risks justify those additional requirements? Are these additions necessary to protect the city water system, or could they be reduced without compromising safety?

5. Plain-English Explanation Requested
This chapter is lengthy for what seems like a focused and straightforward issue. Since terms like "chemical" and "hazard" appear a lot I believe this chapter can be shortened and also wonder if the current wording is dealing with issues that existed in the past but no longer exist. I would appreciate a written plain-language version from Rob or other in-house expert stating simply and clearly what this chapter actually requires property owners and builders to do, under wat circumstances, and how this differs, if at all, from "higher level" requirements.

7. Cost Impact on Residential Construction
Do these requirements add cost to building a typical single-family or commercial property? If yes: Approximately how much added cost per home? How much of that cost is the result of "higher level" requirements. How much cost results only from Ivins-specific requirements? For any Ivins-only cost, is the added public health protection significant enough to justify that expense?