

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICES DATED APRIL 22, 2011
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: JUNE 6, 2011

Date: June 6, 2011

From:

Edward R. Osann
Name (Print or type)

Edward R. Osann
(Signature)

-- Natural Resources Defense Council
Agency, jurisdiction, chapter, company, association, individual, etc.

1314 Second Street, Santa Monica CA 90401
Street City State Zip

I/We (do not) agree with:

The Agency proposed modifications As Submitted on Table No. 4.303.1_

and request that this section or reference provision be recommended:

Approved Disapproved Held for Further Study Approved as Amended

Suggested Revisions to the Text of the Regulations:

Remove the row containing "Replacement aerators" from the table on Water Use Baseline.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

In response to point 6 of the 9-point criteria, the language as proposed is too vague to be of value for code compliance or enforcement. There are no duration factors or daily usage factors provided for replacement aerators, and it is entirely unclear what role, if any, replacement aerators can play in establishing a water use baseline in a new building, which is the purpose of the table. There is no footnote offering further guidance, so the entire row should be deleted.