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June 9, 2014

Government Operations Agency  
California Building Standards Commission  
2525 Natomas Park Dr., Suite 130  
Sacramento, CA 95833  
Via email: [cbsc@dgs.ca](mailto:cbsc@dgs.ca)

Moen Incorporated appreciates the opportunity to provide comments regarding the Proposed Changes to The California Green Building Standards Code.

Moen offers the following comments:

**Section 5.303 Water Efficiency and Conservation**

Moen agrees with the proposed changes to the nonresidential mandatory regulations in Section 5.303 with the exception of metering faucets at 0.2 gpc. This requirement differs from the residential mandatory regulations in Section 4.303 which requires 0.25 gpc. As a manufacturer, we urge the Commission to harmonize across these Sections at 0.25 gpc such that one product can be used regardless of the installation. Having two ever so slightly different water usage requirements forces manufacturers to produce additional models at added cost and only causes confusion in the marketplace where the products may reside on the same shelf.

**Section A5.303 Water Efficiency and Conservation**

Moen urges the commission to delete the entire nonresidential voluntary regulation section as it's impractical and confusing to manufacturers and consumers alike. Manufacturers cannot produce every product model at four water usage rates – baseline plus the three percentage reductions, 12 %, 20% and 25%. The product offering for all fixture types at these multiple levels is simply not there and installers will have a difficult time finding sufficient products to meet any of the percentage reduction savings. Furthermore, the difference in water usage between the 20% and 25% savings falls within the normal water usage variation for some already low flow products and is therefore meaningless. Also, at some point, the water savings based on a calculation collides with the basic functioning and usability of a product. Water conservation is partially dependent on consumer behavior and a 0.35 gpm faucet will not save water if a consumer needs to leave it on twice as long to accomplish a task.

Respectfully submitted,

A handwritten signature in blue ink that reads "John E. Bertrand".

John Bertrand  
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