



December 7, 2015

Council Member Jose Huizar,  
Chair, Planning and Land Use Management Committee  
200 North Spring Street, Room 465  
Los Angeles CA 90012

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**RE: Proposed City of Los Angeles Indoor Water Reduction Ordinance**

Dear Council Member Huizar:

Plumbing Manufacturers International (PMI) appreciates the opportunity to provide comments to the Planning and Land Use Management Committee in regards to the proposed City of Los Angeles Indoor Water Reduction Ordinance. PMI is an international, U.S.-based trade association representing 90% of plumbing products sold in the United States. It has made the promotion of water efficiency and safety a top priority and has included it in its mission statement.<sup>1</sup> PMI's members are industry leaders in producing safe, reliable and innovative water efficient plumbing technologies and have supported water efficiency legislation and codes in California, as well as the voluntary US EPA WaterSense® program.

PMI understands and is engaged as the State of California takes action during this severe drought period. We collaborated with several state agencies including the California Energy Commission (CEC) in developing their latest version of appliance efficiency regulations (Title 20) for plumbing products in order to make California a world leader when it comes to water efficiency. We have also supported the efforts of the California Building Standards Commission (BSC) in harmonizing the requirements of the California Plumbing Code and CALGreen with those of Title 20 so that the proper plumbing products are sold and installed in the State of California in response to the Governor's Executive Order No. B-29-15.

In regards to the proposed City of Los Angeles Indoor Water Reduction Ordinance, PMI understands that it is in response to the Governor's Executive Order B-29-15 that requires a statewide 25% reduction in potable urban water usage. We also recognize that the City of Los Angeles has been forced to import over 80% of its water due to the statewide drought. PMI would like to work with the City of Los Angeles in implementing responsible water reduction measures for plumbing products, and we provide the following comments in the spirit of collaboration.

- PMI is concerned about availability of products that would meet the values shown in Table 99.04.303.4.2 and Table 99.05.303.2.3. It is PMI's understanding that the values were derived from designers that specify such products in order to earn LEED credits, and

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<sup>1</sup>PMI's Mission: To promote the water efficiency, health, safety, quality and environmental sustainability of plumbing products while maximizing consumer choice and value in a fair and open marketplace. To provide a forum for the exchange of information and industry education. To represent openly the members' interests and advocate for sound environmental and public health policies in the regulatory/legislative processes. To enhance the plumbing industry's growth and expansion.

although PMI does agree that such products do exist, the availability may be limited at local retailers. In order to ensure that sufficient product is available for consumers within the City of Los Angeles, we request that the ordinance follow the effective dates established in Title 20 for lavatory faucets and showerheads. As indicated previously, PMI collaborated with the CEC in developing the latest version of Title 20. Within Title 20, the effective date for 1.2 gpm lavatory faucets is July 1, 2016 and July 1, 2018 for 1.8 gpm showerheads. The reason these dates were chosen was based on the fact that manufacturers, retailers and distributors need time to ensure sufficient product was available to accommodate the entire state without disrupting commerce.

- For the other plumbing products outlined in Table 99.04.303.4.2 or Table 99.05.303.2.3, we request an effective date of at least one year after the ordinance is approved by the Los Angeles City Council. Such an effective date would be consistent with the precedent set by the City of Los Angeles with Ordinance No. 180822 when 0.125 gpf urinals were adopted with an implementation date set at one year following enactment.
- Additionally, PMI is concerned with some of the terminology used throughout the ordinance; namely the term “construction projects.” Nowhere within the ordinance is a definition provided for “construction projects,” and therefore further clarification is requested for proper application and enforcement.

In closing, PMI respectfully requests that the Planning and Land Use Management Committee consider our comments to the proposed ordinance. Furthermore, we would like to thank the committee for the opportunity to provide comments for the proposed City of Los Angeles Indoor Water Reduction Ordinance. Our partnership with the regulatory and stakeholder communities in the State of California will continue to promote water efficiency that will produce safe, sanitary, efficient and reliable plumbing products.

Sincerely,



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