

# **WATERLESS<sup>®</sup>.com**

June 5, 2014

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 14-AAER-1  
1516 Ninth Street  
Sacramento, CA 95814

California Energy Commission

**DOCKETED**

**14-AAER-1**

**TN 73108**

**JUN 5 2014**

Dear Committee,

We applaud your efforts to bring more water efficiency to our State and know it is a huge undertaking.

With almost 20 years of research, time and efforts spent by various agencies, associations and consultancies, we are in support of your current proposed updates to have toilets flushing at 1.28 gallons per flush and flushed urinals at 0.5 gpf.

Having been in the urinal market for the past 25 years, we support the 0.5 gpf fixtures as they still seem to be working well, while flushed units of lower than the 0.5 gpf get to the physical and chemical limits of urinals. Meaning a full water scouring of the trap as intended per plumbing code is not warranted and does not retain a standard 2" outlet. Therefore we urge the commission not to adopt a flushing urinal requirement that goes below 0.5 gpf at this time.

As with toilets around the country, a large percentage of all toilets installed in homes and facilities still use on average more than 2 gallons per flush. Flushed urinals use on average 1.5 gallons or more. This is due to the fact that new laws on water efficiency only pertain to new construction. New toilets now work well on 1.28 gpf and flushed urinals at 0.5 gpf. Non-water urinals use no water at all in new construction or at retrofit.

Other considerations:

The very effective and well recognized WaterSense label, which has been established by EPA over the past years, only is concerned with flushed fixtures. It leaves out in their listings non-flushing fixtures such as non-water urinals. EPA acknowledges publicly that non-water urinals should be considered an equivalent to the WaterSense label listed flushed urinals. However, in reality, facility owners and government agencies primarily use products listed directly on the WaterSense list, leaving out or behind some of the most water efficient fixtures on the market. Therefore it is imperative that the Commission include in this Title 20 update non-water urinals that meet the national consensus product standards.

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The numbers: only 100 non-water urinals can save up to 5 million gallons or more of potable water per year! Even if only 15% of the Commission's mentioned one million flushed urinals currently installed in the State of California were retrofitted with the waterless kind, this would equate to about 7.5 Billion gallons of potable water saved per year.

Additional savings realized of course would be in reduced electricity demand as well as reduced sewer treatment and chemicals quantities.

With the current and coming drought problems in our State, proven fixtures with 1.28 gpf for toilets, 0.5 gpf for flushed urinals and non-water urinals are an effective product category to drastically help the State's water efficiency and conservation plans. We urge you to include these fixtures in your efforts and reports. Higher installation rates will also promote additional price reductions for the market.

We appreciate your concerns and stand ready to be of help.

Sincerely,

Klaus Reichardt  
CEO

*Unlike Any Other!*

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