

**From:** [Alma Ramos](#)  
**To:** [IAPMOSD-2027wetc@ConnectedCommunity.org](mailto:IAPMOSD-2027wetc@ConnectedCommunity.org)  
**Cc:** [codes-dept](#)  
**Subject:** 2026 WESTAND ROC Second Circulation of Negative Comments  
**Date:** Monday, June 29, 2026 2:51:59 PM  
**Attachments:** [image001.png](#)  
[2026 WEStand ROC Second Circulation of Comments.pdf](#)  
**Importance:** High

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Dear WESTAND Technical Committee Members,

In accordance with Section 5.6 of the Regulations Governing Consensus Development of the Water Efficiency and Sanitation Standard, I have attached the additional negative comments received after the recirculation period to allow the committee the opportunity to review the comments.

The ballot material for the subject documentation is now available on the KAVI site at: <https://kavi.iapmo.org/higherlogic/ws/groups/28fd25e1-9e1f-493a-92c9-018ed33e7cfc/ballots>

The additional negatives received are for Items #[006](#), [008](#), [088 Comment 01](#), [088 Comment 02](#), [88.01](#), and [104](#). Therefore, these items will be reopened to allow the committee the opportunity to review the comments.

**If you do not wish to change your vote, no action is required.** However, if you wish to change your vote after review of comments, you may do so by **Monday, July 06, 2026, at 5:00 PM (PT)**. Any affirmative voters can change their vote.

If you wish to change your vote [negative] or indicate [abstain] please provide your comments by replying to this email or submitting on Kavi.

Thank you for your willingness to serve on this committee.

***Alma Ramos***

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## 2026 WESTand ROC Second Circulation of Comments

<b>Ballot Name:</b>	<b>Item # 006 Comment 01</b>	
<b>Voter Name</b>	<b>Vote</b>	<b>Comments</b>
Crawford, Shawn	NEGATIVE W/COMMENT	I agree with Taylor Nokhoudian's comments. The proposed definition provides a clearer definition of log reduction target.
Lenger, Markus	NEGATIVE W/COMMENT	These are clearer terms. I agree with the comments by Taylor Nokhoudian and others.
Premer, Damon	NEGATIVE W/COMMENT	I am in agreement with the other comments.

<b>Ballot Name:</b>	<b>Item # 008 Comment 01</b>	
<b>Voter Name</b>	<b>Vote</b>	<b>Comments</b>
Crawford, Shawn	AFFIRMATIVE	I see Kyle Thompson's point, but I agree with John Koeller. This is supposed to be a stretch standard.
Koeller, John	AFFIRMATIVE	<p>While my friend, Kyle Thompson, makes some points relating to possible impacts on building drainage systems, these points apply to all of the indoor efficiency measures in WESTand.</p> <p>WESTand "pushes the envelope" in many areas besides water closets by incorporating new requirements that have yet to be fully tested in the "field." The difference in this case is that 1-gallon (and less) water closets have existed in the U.S. marketplace and the built environment for over 25 years. In those 25 years, millions of 1.1-gallon (or less) water closets have been installed and operated successfully in millions of homes. There is history, and that history has clearly demonstrated that high-efficiency flush volumes are viable in both old and new homes.</p> <p>WESTand is considered to be a "stretch" standard, but is the proposed change a "stretch"? I think not, given that these water closets have been part of our history for over 2 decades.</p> <p>Importantly, the proposal applies only to residential dwelling units, not to any business or other commercial or institutional application (where the current 1.28 gallons per flush maximum is retained). The very comprehensive 2005 study for Canada Mortgage and Housing (referenced in earlier comments on this proposal) concluded that even water closets flushing as low as 0.8 gallons were suitable and feasible in typical new housing. Subsequent to that study, millions of 0.8 gallons-per-flush water closets were successfully installed in the U.S. and Canada.</p> <p>Today, over 40 manufacturers/brands offer nearly 500 water closet models that would comply with the proposed water use maximum. This total includes traditional gravity-fed single- and dual-flush models, as well as pressure assist, vacuum-assist, and electro-hydraulic models of varying designs, all of which are suited to residential use. The 500 models represent about 10% of the total array of water closet models available in today's marketplace.</p> <p>I urge you to consider supporting this proposal, especially so, if you have so far rejected it, and thereby need to change your vote.</p>
Premer, Damon	NEGATIVE W/COMMENT	I agree with Kyle Thompson's comment.
Smith, Billy	NEGATIVE W/COMMENT	I agree with Kyle Thompson's rationale.

## 2026 WEstand ROC Second Circulation of Comments

<b>Ballot Name:</b>	<b>Item # 088 Comment 01</b>	
<b>Voter Name</b>	<b>Vote</b>	<b>Comments</b>
Crawford, Shawn	NEGATIVE W/COMMENT	I agree with Taylor Nokhoudian's comments.
Osann, Edward	NEGATIVE W/COMMENT	I agree with Taylor Nokhoudian's comments.

<b>Ballot Name:</b>	<b>Item # 088 Comment 02</b>	
<b>Voter Name</b>	<b>Vote</b>	<b>Comments</b>
Crawford, Shawn	NEGATIVE W/COMMENT	I agree with Taylor Nokhoudian's comments.
Osann, Edward	NEGATIVE W/COMMENT	I agree with Taylor Nokhoudian's comments.

<b>Ballot Name:</b>	<b>Item # 088.01 Committee Comment</b>	
<b>Voter Name</b>	<b>Vote</b>	<b>Comments</b>
Thompson, Kyle	AFFIRMATIVE	I agree with David Nickelson's assessment. The committee action was to reject this proposal. An affirmative vote here supports that decision.
Crawford, Shawn	NEGATIVE W/COMMENT	I agree with Taylor Nokhoudian's comments.
Smith, Billy	NEGATIVE W/COMMENT	I agree with Taylor Nokhoudian's comments.

<b>Ballot Name:</b>	<b>Item # 104 Comment 01</b>	
<b>Voter Name</b>	<b>Vote</b>	<b>Comments</b>
Crawford, Shawn	NEGATIVE W/COMMENT	I agree with the intent of the vacuum relief valve, but the figures are a little confusing and need to be updated.
Kehoe, Paula	NEGATIVE W/COMMENT	I agree with some of the comments provided.
Nokhoudian, Taylor	NEGATIVE W/COMMENT	I agree with the intent, but the figures are confusing, and there is no clear consensus from the committee.
Osann, Edward	NEGATIVE W/COMMENT	I agree with at least some of Phil Ribbs' negative comments.
Premer, Damon	NEGATIVE W/COMMENT	<p>While I am voting against this, I have a few notes for making the drawing better.</p> <p>AAVs are not mentioned in the UPC, and I think Phil Ribbs' statement, "They are not in the UPC and not designed to accept pressure," is accurate. The nomenclature should state "vacuum relief valve as in UPC Section 608.7." This is a different application, but that is the intended concept (to allow air in when the pump is not pumping).</p> <p>I also wanted to address the 1-inch I.D. discharge pipe size. This is the exact size of the pump discharge of the clothes washer. Yes, we know the receiver pipe at minimum is to be 2-inches for a clothes washer standpipe.</p>
Smith, Billy	NEGATIVE W/COMMENT	I agree with Phil Ribbs' comments.