

## White, Jennifer@DIR

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**To:** Rex Barton  
**Subject:** RE: Petition to Amend Title 8 Section 3449 Regarding Lighting of Portable Restrooms Effective 7-1-2020

**From:** Rex Barton [<mailto:rex@lunarglo.com>]  
**Sent:** Wednesday, August 19, 2020 3:24 PM  
**To:** 'Shupe, Christina@DIR'  
**Subject:** Petition to Amend Title 8 Section 3449 Regarding Lighting of Portable Restrooms Effective 7-1-2020  
**Importance:** High

Our Company, LunarGlo LLC (previously RJ Products LLC), was pleased to be invited to Sacramento in March of 2015 to be part of the Advisory Committee regarding Title 8 Section 3441 and 3449. LunarGlo is a small American manufacturing company that produces solar powered restroom lights and solar powered vent fans for same.

Since that date in 2015 we have kept in touch to offer any assistance when asked and to insure that we were aware of the final dates when the regulation was to be put into effect. When we received notification of the July 1, 2020 date we shared that information with our customers in California.

When we recognized the requirement for lighting output was 42% higher than our light and 42% higher than our competitors we were concerned. No one that I am aware of had asked for a sample to see what was available. During the past seven years we have been manufacturing the exact same solar light and have yet to receive the first complaint regarding too little light for comfort when using a lit portable restroom. Our engineer advised us that the LED's can be driven a little harder but the gain in output which is considerably below the required 5 foot candles will result in shortening the life of the solar light significantly.

I would ask that you consider the fact that there are thousands of solar lights already in California supplying effective lighting for folks who are covered by Title 8 Section 3441 and 3449 that will not fall within the guidelines of the 5 foot candle requirement as listed in the regulation. This situation leaves them all exposed to fines for non-compliance which they have no control over at this time.

I respectfully ask that the guidelines for lighting portable restrooms in these regulated areas be changed to 2.90 foot candles, which has been the accepted light level for the past seven years or change the dimension from where the measurement is taken from 53" to 34" which results in 5 foot candles at the 34" mark which we can meet with the current light output.

We also respectfully request that the hours of operation of the solar light be defined as "consistently lit from dusk to dawn", meaning that the lights be as bright from the time they come on until they shut off at dawn. Having a light in a portable restroom is useless if it cannot or will not stay on so the user can see while using the facility.

Respectfully submitted,

Rex Barton, Owner

Judy Barton, Owner

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