



8280 Willow Oaks Corporate Drive  
Suite 400  
Fairfax, VA 22031-4511  
Tel: 703.536.7080  
Fax: 703.536.7019  
[www.irrigation.org](http://www.irrigation.org)

June 11, 2019

Ms. Veronica Blette  
Chief, WaterSense Branch  
U.S. Environmental Protection Agency  
Washington DC 20460

Dear Ms. Blette:

On behalf of the 1,600 members of the Irrigation Association, thank you for your continued dedication to water-use efficiency and the promotion of WaterSense-labeled technologies and certifications. The IA believes in the value of the WaterSense program and hopes to see even more labeled irrigation products and technologies available in the future. We also appreciate the opportunity to comment on version 2.0 of the WaterSense Draft Specification for New Homes.

When version 1.0 was released in 2009, the Irrigation Association stated in our comments, dated July 7, 2009, that we “recommend to the EPA that decisions impacting landscape irrigation should be driven locally and that the EPA not move forward with the outdoor criteria of the specification until locally driven and clearer outcome-based performance criteria are developed in partnership with qualified stakeholders.” We feel that version 2.0 brings us closer to the goal of locally-driven decisions.

The Irrigation Association believes that the new homes criteria should not only strive to conserve water, but also be simple for Home Certification Organizations and homebuilders to implement. We feel that this was a big challenge for the original versions of the new homes program. The IA also believes that the outdoor criteria should not deter entities from participating in the WaterSense new homes program, while also not discouraging the installation of an irrigation system. The new homes labeling program should promote an efficient irrigation system that saves water relative to a typical system installed in a given area.

The Irrigation Association believes that the new homes specification should have three objectives:

- 1) Promote the value of water conservation in new home construction.
- 2) Save water relative to a typical new home.
- 3) Promote the use of existing WaterSense-labeled technologies, products and certifications in the marketplace.

The Irrigation Association also supports the methodology of “right plant, right place.” And, while the IA believes that significant water savings can be achieved just through efficient irrigation technology design, use, and implementation, we understand the EPA’s desire to promote the concept of “right plant, right place.” However, we do not believe that this concept should deter consumers from investing

in an irrigation system. It is the opinion of the Irrigation Association that no option of the WaterSense new homes program should deter consumers or builders from installing an irrigation system.

Rather than WaterSense placing water savings percentages on irrigation technologies, such as the 22 percent value placed on WaterSense labeled spray sprinkler bodies, WaterSense should mandate that these labeled products be used. The Irrigation Association looks forward to working with WaterSense to expand the portfolio of products and technologies that are labeled by WaterSense, and we expect that the WaterSense new homes program will be a vehicle to promote the use of current and future technologies. The IA believes it is in the industry's and WaterSense's best interest to have WaterSense-labeled irrigation technologies and products installed in an irrigated landscape of a WaterSense-labeled new home. The WaterSense new home labeling program is WaterSense's best vehicle to promote the sale of WaterSense-labeled irrigation products and technologies in the marketplace. Not mandating the use of these technologies seems like a very big missed opportunity.

The Irrigation Association believes that WaterSense is moving in the right direction with providing different options for home builders to participate in the WaterSense new homes program. Allowing for this flexibility provides HCOs the opportunity to build a Proposed Certification Method based on their local climate and market. We feel that this is ultimately beneficial to the success of the program. However, the Irrigation Association requests the following be included in version 2.0 of the new homes specification:

- 1) In an irrigation system installed in a WaterSense new home, WaterSense-labeled technologies should be used where applicable (e.g., spray sprinkler bodies, weather-based irrigation controllers, and any future irrigation technologies that are labeled by WaterSense).
- 2) The WaterSense new home program, including HCOs, should recognize the hard work many water providers, municipalities and (in some cases) state governments have made in both incentivizing or requiring irrigation efficiency measures in new construction.
- 3) All references to "supplemental irrigation" should be changed to "irrigation."
- 4) The Irrigation Association believes in the value of certified irrigation professionals who design, install, manage, and/or audit irrigation systems. We believe that the PCM should again require the use of a certified professional to design, install, and/or audit the irrigation system used in a WaterSense labeled new home.
- 5) The Irrigation Association requests that the HCO develop a transparent method for calculating and estimating outdoor water use, allowing builders and installers the ability to understand how the HCO makes the calculations.
- 6) The Irrigation Association believes in, "right plant, right place," but we feel that significant water savings can occur immediately with efficient irrigation technologies and management. Within the WaterSense new homes program, a greater value should be placed on the benefits of efficient irrigation technologies, in addition to the plants that are being irrigated.

The Irrigation Association appreciates our partnership, and we look forward to working with you to make the revised new home program successful. If you have any questions about our comments or suggestions, please feel free to contact me at [johnfarner@irrigation.org](mailto:johnfarner@irrigation.org) or 703.625.2038. Thank you for all of your hard work and continued support of our mission to promote efficient irrigation.

Sincerely,



John Farner  
Government and Public Affairs Director