

Docket ID Number: EPA–HQ–OW–2020–0026

Recent Specifications Review and Request for Information on WaterSense Program

July 24 2020

The Honorable Andrew Wheeler
Administrator, U.S. Environmental Protection Agency

Dear Administrator Wheeler:

On behalf of the approximate 1,600 member companies of the Irrigation Association, I am writing to notify you of our continued support for the EPA’s WaterSense program, in response to the review of WaterSense product performance criteria as required under the America's Water Infrastructure Act (AWIA) of 2018.

Since its inception in 2006, WaterSense has served as a successful public-private partnership. The collaboration between industry, public and private water providers, along with the federal government, has helped expand the water efficient product marketplace. As our nation works to develop ways to address water shortages and its aging infrastructure system, the successes of the WaterSense program should not be overlooked.

The Irrigation Association collaborated with the EPA and other NGOs to create the WaterSense program. Driven by our mission statement, to promote efficient irrigation, the Irrigation Association represents experts in all aspects of irrigation, including agriculture, landscape, turfgrass and golf, among others. Irrigation manufacturers, distributors and contractors have proudly partnered with WaterSense since its inception to strengthen the marketplace for efficient water-use technologies and practices.

As you are well aware, WaterSense is a non-regulatory, voluntary program that is not duplicative of any programs offered by the federal government, relating to turfgrass and landscape irrigation. This national effort allows for the elimination of possible federal regulations that could burden both consumers and industry. The voluntary water-efficient performance measures created by WaterSense allow manufacturers to better plan and allocate resources.

Local entities can then determine how best to proceed with promoting water-efficient products in their communities, showing a true commitment to federalism. Local water authorities, utilities, and city governments to encourage the use of WaterSense-labeled products through various rebates.

In addition to having industry support for the program, the Irrigation Association has been an official WaterSense partner since the program's inception. Having certified the most irrigation professionals through our WaterSense labeled irrigation contractor, designer, and auditor certifications, we are familiar with the benefits of WaterSense. With the WaterSense label for certification programs, consumers are more aware of our certified irrigation professionals. This helps in the promotion of a strong workforce that consumers can rely upon for industry expertise.

WaterSense is supported by consumers, manufacturers, and public and private agencies charged with supplying water to American households and businesses. Thanks to WaterSense, American families and businesses have greater access to water-efficient products, including irrigation controllers that can reduce an average home's irrigation water use by more than 20 percent, while making irrigation system management significantly easier to perform. This means that an average home can save nearly 8,000 gallons of water annually. Since 2006, indoor and outdoor WaterSense-labeled products have saved more than 1.5 trillion gallons of water. The benefits of WaterSense directly affect the pocketbooks of Americans – with \$36.2 billion in water and energy bill savings. These savings have not gone unnoticed by the consumers. In fact, these savings are a tool contractors, distributors and manufacturers use to sell WaterSense-labeled technologies.

With that said, our only concern regarding the WaterSense program is the effort of various state legislatures to make WaterSense-labeled technologies mandatory. The Irrigation industry enthusiastically supports the continuation and growth of the WaterSense program, specifically the voluntary aspect of the program. The IA also continues to participate in ANSI standard setting processes for other irrigation technologies. There is room for both in the water efficiency discussion, but our stance is that the WaterSense program should be leading the national discussion on water efficient technologies and enhancing the market for these technologies. However, this label should remain voluntary. This is crucial to the future success of the program.

Maintaining America's drinking water supply is also of concern. Water is one of our most precious national resources. Reducing landscape water use, which can account for up to 70 percent in some parts of the country, is a critical way we can help address the seasonal scarcity. As mentioned earlier, the Irrigation Association's mission statement is to promote efficient irrigation. Our industry is at the cutting edge of developing technologies and practices that are designed to significantly reduce the amount of water used in landscapes across the U.S., while ensuring that Americans continue to enjoy all of the benefits that managed landscapes have to offer.

Sincerely,



John Farner
Government and Public Affairs Director