

April 5, 2023

U.S. Environmental Protection Agency  
WaterSense Program  
1200 Pennsylvania Avenue NW  
Washington, DC 20004

**Re: WaterSense Notice of Intent to Develop a Draft Specification for Spray Sprinkler Nozzles**

To whom it may concern:

On behalf of the Irrigation Association, we appreciate the opportunity to provide the following comments in response to the Environmental Protection Agency WaterSense program's *Notice of Intent (NOI) to Develop a Draft Specification for Spray Sprinkler Nozzles*.

The IA represents over 1,200 member companies including irrigation equipment and system manufacturers, dealers, distributors, designers, consultants, contractors and end users. We are committed to transforming humanity's stewardship and use of water, enabling the long-term sustainability of the planet's water and natural resources, and improving the quality of life through a reliable global food supply and vital green spaces.

We support the goals and objectives of the WaterSense program, and we are committed to working with EPA and WaterSense to ensure workable specifications for the industry, communities, utilities and ultimately consumers. As many utilities are already rebating a variety of "high efficiency" nozzle products, we understand the value of and need for a WaterSense specification, and we stand ready to assist in the development of such a specification.

We also note that additional work is needed to build consensus on the scope of such a specification. **Because of this, we recommend — and are committed to initiating — the development of a voluntary, consensus-based American National Standards Institute standard that defines spray nozzles efficiency that could then be used as a basis for a WaterSense specification.** The standard development process would forge consensus and help resolve issues IA members have raised in their individual comments on this NOI.

To this end, we are prepared to engage with an organization such as the American Society of Agricultural and Biological Engineers to facilitate the development of such a standard. Further, we

recognize this recommendation requires a commitment of time and resources on the part of the IA, and we are prepared to bring such a process to a successful conclusion.

Finally, we note that it will be critical, either through the standard-setting process or subsequent specification development, to address how a specification for spray sprinkler nozzles interfaces with other WaterSense specifications (i.e., irrigation controllers and spray sprinkler bodies).

We appreciate the opportunity to provide this input and look forward to continuing to engage with WaterSense throughout this process. Please contact IA Advocacy Director Nathan Bowen ([nathanbowen@irrigation.org](mailto:nathanbowen@irrigation.org)) with any questions.

Sincerely,

A handwritten signature in black ink that reads "Natasha L. Rankin". The signature is written in a cursive, flowing style.

Natasha L Rankin, MBA, CAE  
Chief Executive Officer