



July 23, 2020

Mr. Andrew Wheeler
Administrator
US Environmental Protection Agency
Washington, D.C.

Re: Docket ID No. EPA-HQ-OW-2020-0026

Dear Mr. Wheeler,

The Pacific Institute writes to express our strong support for both maintaining and strengthening the WaterSense Program at the U.S. Environmental Protection Agency (USEPA) and to share with you our submitted comments regarding WaterSense. We are filing these comments in response to the Notice of Recent Specifications Review and Request for Information on the WaterSense Program published on April 10, 2020 in the Federal Register. Our comments address the recent USEPA review of the WaterSense Program and highlight the many benefits that residential and non-residential consumers, communities, and our nation receive from the expanding use of WaterSense labeled products.

First, the decision to keep in place current WaterSense standards for water-related appliances and fixtures is the minimum response -- those standards have proven tremendously effective at reducing the water, energy, and economic costs of those water-using fixtures and to have weakened any of them would have had a huge and adverse economic impact on manufacturers and consumers. We believe, however, the evidence also supports updating, strengthening, and expanding WaterSense to cover new technologies. This includes all devices currently under consideration by the WaterSense Program: soil moisture-based irrigation controllers, ion-exchange water softeners, and bath and shower diverters. Moreover, some state standards that go beyond the federal code by use of WaterSense specifications have been in place for nearly a decade, highlighting the need to modernize and update the WaterSense standards and list of appliances. The USEPA should follow suit and adopt new national standards and eliminate the risk that 50 different state standards will once again complicate the efforts of manufacturers to meet market demands.

Second, a primary benefit of high-efficiency appliances, such as toilets, is that they save homes and businesses money on water and wastewater bills. Homeowners and business owners that update hot-water using appliances, such as dishwashers or pre-rinse spray valves, receive the added benefit of cost savings on energy bills. Indeed, many residential and non-residential measures have a “negative

cost,” which means that they save the customer more money over their lifetime than they cost to implement. As WaterSense has expanded to outdoor water-using devices such as irrigation controllers, these products can help to save consumers from overwatering their landscape, improving their landscape’s health, reducing nuisance flooding, and contributing to reduced runoff into local watersheds. USEPA should initiate an effort to quantify these savings nationwide, including both water and energy savings, as well as additional “co-benefits,” following methods such as those described in the Pacific Institute’s publication, *Incorporating Multiple Benefits into Water Projects: A Guide for Water Managers*.¹

Third, from a community perspective, our research has shown that urban water conservation and efficiency measures are less expensive than most new water-supply options and are thus the most cost-effective ways to meet current and future water needs.² In California, for example, we found that per unit of water, water conservation and efficiency measures were, in nearly all cases, the least expensive alternative water supply option when compared to water reuse and recycling, stormwater capture, and desalination. An additional benefit to communities that actively pursue water conservation and efficiency is that it can, and already has in many places, reduced or removed the need to access new water supply at all, saving ratepayers enormous amounts of money over the long term.³

Finally, at the national level, water savings are measurable. Total water use in US households has dropped 20% between 1990 and 2015 according to the US Geological Surveys regular five-year assessment of US water use.⁴ On a per capita basis, domestic water use has dropped 40% over this period. A final benefit of water efficiency products is that they contribute to individual as well as community resilience to water supply shortages and disruptions, lessening the consequences of severe droughts and increasing resilience to climate-change induced scarcity. The USEPA should evaluate the role WaterSense programs play in enhancing water resilience for utilities. This work could be integrated with the ongoing USEPA effort “Creating Resilient Water Utilities (CRWU).”

In closing, we would like to reiterate that water efficiency and water efficient products, such as those credited by the USEPA’s WaterSense Program, provide substantial, measurable benefits beyond

¹ <https://pacinst.org/publication/incorporating-multiple-benefits-into-water-projects/>

² Cooley, H. and R Phurisamban. 2016. The Cost of Alternative Water Supply and Efficiency Options in California. <https://pacinst.org/publication/the-cost-of-alternative-water-supply-and-efficiency-options-in-california/>. Also, Cooley, Heather, Rapichan Phurisamban, and Peter Gleick. "The cost of alternative urban water supply and efficiency options in California." Environmental Research Communications 1, no. 4 (2019): 042001.

³ For example, see Feinglas, Gray, and Mayer (2013) <https://www.financingsustainablewater.org/resource-search/conservation-helps-limit-rate-increases-colorado-utility>

⁴ https://www.usgs.gov/mission-areas/water-resources/science/water-use-united-states?qt-science_center_objects=0#qt-science_center_objects



water savings to homeowners, businesses, and communities. These benefits save money and help to ensure a secure and resilient future for all. We urge the USEPA to not only continue and fully fund the WaterSense Program, but to strengthen it by measuring the co-benefits of the program beyond water savings, continuing to improve device specifications, adding new water-using appliances and devices to the program, and by supporting implementation and distribution of these products nationwide.

Sincerely,

Morgan Shimabuku
Research Associate
Pacific Institute

Peter H. Gleick
President-emeritus
Pacific Institute
Member US National Academy of Sciences