

April 24, 2017

Honorable Scott Pruitt  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Administrator Pruitt:

The undersigned manufacturers, water utilities, distributors, home builders, architects, and industry professionals join in urging you to continue funding for EPA's very successful WaterSense program in Fiscal Year 2017 as well as FY 2018 and beyond. In a time where each program at EPA is being carefully reviewed and budget decisions are being weighed, the WaterSense program has demonstrably proven to be a sound investment of EPA's resources.

This is a true public-private partnership, and an effort that requires the federal government to play a key facilitating role.

The WaterSense program is a voluntary program, not a regulatory one, that costs EPA approximately \$3 million a year to administer, but has one of the best paybacks of any federal program. It is an example of an effective collaboration between industry and the government on determining voluntary water efficient performance measures that can be used by consumers, industry, and state/local governments.

### **WaterSense Provides Benefits to Consumers**

The WaterSense label is critical to consumers seeking to identify and purchase a water-efficient plumbing or irrigation products. Utilizing WaterSense-labeled products, consumers have saved more than \$33 billion in water and energy bills since the inception of the program.<sup>1</sup> WaterSense has proven to be an effective tool for local communities and water providers to use in reducing the demand for limited water resources in their communities, saving an estimated 1.5 trillion gallons of water.

As many states continue to face severe drought conditions, WaterSense is helping residents reduce their water use and conserve water for other uses, including agriculture. In Oklahoma, for example, an estimated 3,314,535 residents live in drought areas.<sup>2</sup>

### **WaterSense Provides Benefits to Industry**

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<sup>1</sup> Environmental Protection Agency, WaterSense Accomplishments 2015

<sup>2</sup> State Drought Monitor, March 30, 2017, The National Drought Mitigation Center, University of NebraskaLincoln <http://droughtmonitor.unl.edu/Home/StateDroughtMonitor.aspx?OK>

Thanks to the collaborative nature of the WaterSense partnership and its national scope, manufacturers, retailers, and utilities have been able to use this program effectively. Examples include:

- As a result of the WaterSense program, businesses have developed more than 16,000 models of WaterSense-labeled products for bathrooms (showerheads, faucets, and urinals, in addition to toilets), commercial kitchens, and irrigation systems.
- In 2015, more than 50 percent of all tank-type toilets entering the market complied with WaterSense specifications.
- Today, all toilets, faucets, and showers sold in The Home Depot stores are WaterSense-labeled. Last year, The Home Depot offered more than \$43.8 million in product markdowns of WaterSense-labeled products to encourage homeowners to switch out their older, less efficient devices. The retailer also partnered with utilities to make more than 350 local utility rebates available to its customers. This included a statewide campaign in drought-stricken California to provide \$100 incentives for WaterSense-labeled toilets.<sup>3</sup>
- KB Homes constructs homes optimized for water conservation, particularly in water-challenged regions. Cumulatively, KB Homes' WaterSense-labeled homes and installation of water-efficient features save an estimated 3 million gallons of water daily, compared with typical existing homes that do not have the same water-saving items.<sup>4</sup>
- A 2016 survey of water utilities found that 72 percent of utilities recognize that the WaterSense program is critical to their commercial, industrial, and institutional water conservation efforts, and 86 percent of utilities consider conserved water as one of their water supply alternatives.<sup>5</sup>
- The WaterSense website lists 130 different rebates being offered by local water authorities, utilities, and city governments to encourage the utilization of WaterSense-labeled products.

Because of the value of WaterSense to their business, their employees, and their customers, more than 1,700 manufacturers, water and energy utilities, distributors, state and local governments, non-profit organizations, trade associations, and retailers nationwide have partnered with the program.

### **EPA's Role is Critical to WaterSense's Success**

The federal government's role in WaterSense is key and adds important credibility to this program. According to NOAA, last year 31.5 percent of the United States experienced moderate to exceptional drought.<sup>6</sup> Much of this occurred around cities experiencing the highest population growth. These communities are forced to make decisions on how best to reduce demand for their limited resources. They recognize that reducing indoor and outdoor water use in residences and businesses can be cost effectively accomplished through water-efficiency standards for plumbing fixtures and efficient landscape irrigation practices. Rather than having these local officials make their own determination on the maximum amount of water used per flush by toilets/urinals and

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<sup>3</sup> Environment Protection Agency, 2016 WaterSense Partners of the Year Award descriptions: <https://www.epa.gov/watersense/watersense-awards#The%20Home%20Depot>

<sup>4</sup> KB Homes Oct. 11, 2016, news release, "KB Home Wins 2016 WaterSense® Sustained Excellence Award."

<sup>5</sup> American Water Works Association. 2016 National Survey of Commercial, Industrial, and Institutional Water Efficiency Programs .

<sup>6</sup> NOAA Website, accessed 3/30/17: <https://www.ncdc.noaa.gov/sotc/drought/201613#national-overview>

per minute by faucets/showerheads, WaterSense provides the national specifications agreed to by industry and guaranteed by the federal government.

States and cities are using financial incentives, community planning efforts, and water conservation requirements for public buildings to promote the adoption of efficient fixtures.<sup>7</sup> WaterSense is the one commonality shared by all of these efforts. It has been a critical tool for state, local officials, and industry to coordinate and partner on these initiatives. If WaterSense is eliminated, the worst-case scenario would be that each community would need to determine its own performance specifications — creating a patchwork of regulations that manufacturers and other industry stakeholders would have to meet, and adding to the costs of implementing and complying with such efforts. Moreover, as the WaterSense partnership is not duplicated by any other private or public program, it is vital that EPA continue to fund and encourage it. This program is an important component of EPA's statutory requirements to oversee and maintain the quality of America's drinking water supply.

### **WaterSense Is a Cost-Effective Investment**

The economic and social benefits of the WaterSense program far outweigh its \$3 million budget by helping families and businesses of all sizes to reduce utility bills and to conserve water. It is an independent and trusted resource for local policymakers in determining how to best to allocate water resources in their communities. We urge you to continue this program so that this highly valuable and productive partnership between industry and government can continue.

We greatly appreciate your consideration of the issues above, and look forward to working with you on preserving WaterSense and, in the future, on other issues of importance to business and the public.

Should you have any questions, please contact Dain Hansen, chair of the High-Performance Buildings Coalition and senior vice president of Government Relations for The IAPMO Group, at [dain.hansen@iapmo.org](mailto:dain.hansen@iapmo.org) or (202) 445-7514.

Sincerely,

### **Manufacturers:**

- Brasstech, Inc.
- Delta Faucet Company
- Hunter Industries
- Kohler Co.
- LIXIL Corporation
- Moen Incorporated
- Netafim USA
- Rain Bird Corporation
- Sloan, Inc
- Toto USA, Inc.

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<sup>7</sup> National Conference of State Legislatures website, accessed 3/30/17: <http://www.ncsl.org/research/environment-and-natural-resources/water-efficient-plumbing-fixtures635433474.aspx>

**Trade Associations:**

- American Institute of Architects (AIA)
- American Supply Association (ASA)
- American National Standards Institute (ANSI)
- American Rainwater Catchment Systems Association (ARCSA)
- American Society of Irrigation Consultants
- American Society of Plumbing Engineers (ASPE)
- American Society of Sanitary Engineering (ASSE)
- American Water Works Association (AWWA)
- Association of Energy Engineers
- ASHRAE
- Copper Development Association Inc.
- Energy Management Association
- High-Performance Buildings Congressional Caucus Coalition
- Illuminating Engineering Society (IES)
- International Association of Plumbing and Mechanical Officials (The IAPMO Group)
- International Facility Management Association (IFMA)
- Irrigation Association
- LonMark International
- Mechanical Contractors Association of American (MCAA)
- Plumbing Manufacturers International (PMI)
- National Association of Home Builders (NAHB)
- National Institute of Building Sciences
- Plastic Pipe and Fittings Association
- Plumbing Contractors of America
- Plumbing-Heating-Cooling Contractors Association (PHCC)
- Radiant Professionals Alliance (RPA)
- United Association of Journeymen and Apprentices of the Plumbing, Pipefitting and Sprinkler Fitting Industry of the United States and Canada (UA or United Association)
- Utility Management and Conservation Association (UMCA)
- Water Quality Association (WQA)

**Key Industry Stakeholders:**

- AEC Science & Technology, LLC
- Alliance for Water Efficiency
- Armstrong Filtration
- ASPE Eastern Michigan Chapter
- CSA American, Inc.
- Driftwood Valley Association of Yelm, Washington
- Environmental and Energy Study Institute
- Ewing Irrigation and Landscape Supply
- F.W. Behler, Inc.
- Green Business Certification, Inc.

- IAPMO R&T
- Institute for Market Transformation (IMT)
- Malachite, LLC
- Maximum Performance (MaP) Testing
- Mechanical Hub
- National Inspection Testing & Certification
- NSF International
- Pacific Construction and Radiant Heat
- Passive House Institute United States
- Plumbing Engineer Magazine
- Robert P. Mader, Editorial Director, Contractor Magazine
- Steven Panelli, Chief Plumbing Inspector, CA
- Underwriters Laboratories (UL)
- U.S. Green Building Council

cc: Ryan Jackson, Chief of Staff, EPA  
Mandy Gunasekara, Senior Policy Advisor, EPA  
Samantha Dravis, Office of Policy, EPA  
Senate and House Congressional Leadership  
Senate and House Committee on Appropriations Leadership  
House Committee on Energy and Commerce Leadership  
Senate Committee on Environment and Public Works Leadership



## AN OVERVIEW

Founded in 1926, the IAPMO Group is a world leading technical expert on demand-side water management and related energy issues. We focus on where people come in contact with water.

## Why do we focus on water?



**PUBLIC HEALTH & SAFETY**



**WATER EFFICIENCY & CONSERVATION**



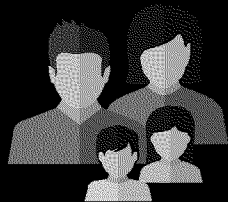
**ENERGY-WATER NEXUS**



**INTERNATIONAL DEVELOPMENT**



**WORKFORCE DEVELOPMENT**



The average American family uses about **300 gallons** of water per day contributing to the **46.8 trillion gallons** consumed in the United States each year



**35%** of the United States is suffering from water scarcity

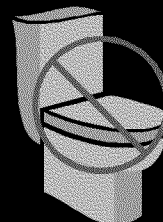
Water-related energy use accounts for up to **20%** of total electricity consumption



Every job created in the water sector helps add another **3.68 jobs** in the national economy

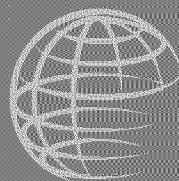


Worldwide **748 million** people do not have access to safe drinking water



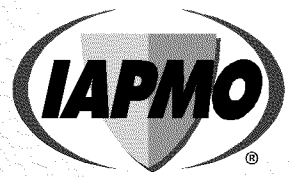
**2.5 billion** people lack access to improved sanitation (pit latrine or better)

Hundreds of manufacturers and thousands of trained labor and contractors, engineers, suppliers, plumbing and mechanical inspectors, and building officials.



With offices around the world, IAPMO services are utilized by over half the world's population.

## What do we do?



### DEVELOP

CODES AND STANDARDS



Codes and standards become the national framework for how water and sanitation systems come together efficiently in a way that protects the public health and safety.

Developed using an ANSI accredited process that provides fairness and transparency.

Products and services used throughout the world, including the United States, Australia, Philippines, Indonesia, India and Middle-East.

WE•Stand™ (Water Efficiency Standard), Uniform Plumbing Code®, Uniform Mechanical Code®, Uniform Solar Energy and Hydronics Code®, Uniform Swimming Pool, Spa & Hot Tub Code®, and ASSE International Standards.

### TEST

AND  
CERTIFY PRODUCTS



Operate one of the largest testing laboratories for water related products in the world.

In the United States, the demand for plumbing fittings and fixtures is a \$10.7 billion a year industry.

Shipments of plumbing products from the US equals \$8.6 billion per year.

Testing laboratories in the US, China, Australia, Indonesia.

### ADVOCATE

FOR  
POLICIES THAT MAKE SENSE



Promote policies that increase public health and safety, save money, conserve water and energy, and remove technical barriers to trade.

### GROW

INTERNATIONAL MARKETS



Assist developing countries in addressing water scarcity and quality issues.

Work in partnership with government and international partners to expand market access and develop reliable supply chains.

### PROVIDE

INDUSTRY LEADING  
EDUCATION & TRAINING



Provide training to the multiple layers of professionals that work on these systems – architects, engineers, plumbers, code enforcement officials.

There are 387,000 plumbing professionals working in the United States.

### RESEARCH

ON WATER EFFICIENCY  
WITHIN BUILDINGS



Our work is based upon science and aided by industry collaboration tackling issues such as drainline carry, water reuse, and water pipe sizing.

## A Voice for Industry & Innovation

Plumbing  
Systems

Alternative  
Water Sources  
Water Reuse

Solar and  
Geothermal  
Systems

Radiant Heating  
Boiling/Hydronic  
Systems

Backflow &  
Cross Connection  
Protection

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