

June 8, 2020

Mr. Andrew Wheeler  
Administrator  
US Environmental Protection Agency  
Washington, DC



**RE: Comments on Docket ID No. EPA-HQ-OW-2020-0026  
Request for Information on the WaterSense® Program**

Dear Administrator Wheeler:

The Sonoma-Marín Saving Water Partnership (Partnership) writes to express our strong support for the WaterSense program at the Environmental Protection Agency (EPA) 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 EPA review of the WaterSense program, the EPA's decision not to revise any of the WaterSense product specifications, and the specific questions asked within the Federal Register Notice related to consumer satisfaction.

The Partnership represents 12 water utilities in Sonoma and Marin counties in California that have joined together to provide regional solutions for water use efficiency. The utilities include the Cities of Santa Rosa, Rohnert Park, Petaluma, Sonoma, Cotati, Healdsburg; North Marin, Valley of the Moon and Marin Municipal Water Districts; Town of Windsor, California American Water – Larkfield District and Sonoma Water (Partners). Each of the Partners have water conservation programs that can assist customers in reducing their water use. The Partnership was formed to identify and recommend implementation of water use efficiency projects and maximize the cost-effectiveness of water use efficiency programs in our region.

The EPA WaterSense program is another trusted partner that we rely on to help us meet regional water supply needs through investments in demand management programs that incentivize and promote the use of WaterSense products by our customers. The science based rigor of the WaterSense product specifications provides the underpinning and confidence to make these investments, with the knowledge that our and our customer's expectations for water savings will be realized. Although end user satisfaction with WaterSense labeled products may vary for a wide variety of reasons, it is of utmost importance that consumer satisfaction criteria remain separate from product specifications, and that WaterSense uphold the current regime for specifications based on measured values of performance that are tested in a laboratory and certified by a third-party certifying organization. Including a vague, non-scientific

concept such as customer satisfaction criteria could introduce uncertainty and bias into what is currently a fair and scientific process for setting WaterSense specifications.

Although reasonable uses for consumer satisfaction information can exist within WaterSense, the scope of customer satisfaction research should be limited to consideration of the WaterSense brand itself and WaterSense partnerships, like the type of customer satisfaction research ENERGY STAR has conducted in the past. Proper uses of customer satisfaction survey results would inform the EPA about Americans' opinion of the WaterSense brand and their experience with WaterSense labeled products in homes and businesses. This information could help EPA guide the direction of the WaterSense brand and program. However, any product-specific customer satisfaction research is best left to the marketplace and manufacturers themselves. Product manufacturers conduct customer satisfaction research frequently and keep the results to themselves so they can use it strategically to develop their products and brand to competitive advantage.

This is not to say that WaterSense specifications should not move forward and advance in the future. They should be reviewed regularly so that WaterSense products keep up with changing technology and industry innovation, as has been the case with WaterSense products to date. By doing so, WaterSense can continue to fuel innovation in American manufacturing while providing consistent and fair metrics for product development in the plumbing and irrigation industries.

The WaterSense program has been a tremendous success for EPA, and has been a successful partner of the utilities in the Sonoma-Marín Saving Water Partnership for many years. We strongly encourage EPA to maintain the program's effectiveness so our Partnership can continue to rely on regional water supply investments that tailor water conservation programs around consumer use of WaterSense-labeled products.

Sincerely,

Drew McIntyre, PE  
General Manager, North Marin Water District

Technical Advisory Committee Chair  
Sonoma-Marín Saving Water Partnership