

Template for Public Comment Submission on WaterSense Documents

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Topic: New Homes Certification and Labeling System for WaterSense-Labeled New Homes

Comment: The Alliance continues to support third-party verification of the performance of WaterSense-labeled products, and welcomes the inclusion of this concept in the proposed certification and labeling system for new homes.

Suggested Change (or Language): The Alliance has a number of comments and questions as follows:

1. It appears that the draft proposal contemplates a free-standing and self-contained certification system. Consideration should be given to the relationship between this certification protocol and that of other whole-building labeling programs, such as Energy Star and LEED. Must the entire framework remain separate, or are there opportunities for HERS raters to become WaterSense home inspectors, for example?
2. Paragraph II.B on page 2 seems to indicate that each new home offered into the program will require a separate inspection before certification and labeling. Similarly, paragraph B.ii. [sic] on page 7 seems to indicate that each home with an installed irrigation system will have a WaterSense irrigation audit. Did EPA consider any sampling regime, such as that used for Energy Star Homes, for either of these on-site inspections? Were there reasons found for rejecting sampling for either type of inspection?
3. What analysis is available regarding the relative cost to the builder for inspection and certification compared with the cost of implementing the WaterSense new home criteria themselves? Put another way, is inspection and certification likely to constitute a large fraction of a builder's total cost of participating in the WaterSense New Homes Program?
4. Why is it necessary for the Program Administrator to operate nationally, and does EPA contemplate that there will be only one administrator? Might there be regional program administrators, or might other building rating programs (i.e., LEED) serve as program administrators for WaterSense certification of buildings in their program?
5. Is the role of certification provider open to water and wastewater utilities?
6. Regarding the registry of Builder Partners, will the partnership agreement with WaterSense builders require the builder to actually deliver a WaterSense certified new home to market within a specific period of time? Otherwise, a roster of builders who *might intend* to *eventually* build WaterSense new homes could be misleading.
7. The draft outdoor water efficiency inspection (p. 7) appears to require a separate "inspection" of any irrigation system. Is this inspection actually an "audit" performed by a

WaterSense certified irrigation auditor? Is any open trench inspection required during installation?

8. When does the builder actually pay for the inspection? And when does the builder pay for an irrigation audit, if necessary? It is important that payment not be contingent upon the home passing the inspection, and the criteria should so state.

9. Where new home programs with water efficiency measures already exist, we suggest that WaterSense work closely with local builders and local inspector/certification providers to encourage builders to participate and assure a smooth and effective transition to the WaterSense program should they choose to do so.

Topic: Draft Inspection and Certification Guidance for WaterSense-Labeled New Homes

Comment: The Alliance for Water Efficiency has comments as well as a question.

Suggested Change (or Language):

1. In the first paragraph, WaterSense criteria should not be characterized as a “water-efficient home *standard*,” since the term “standard” often connotes a mandatory requirement, rather than a voluntary program such as WaterSense.

2. What are “issues associated with compliance” that might require a home to be re-inspected (p. 1)? This language appears unnecessarily vague.

3. It would be preferable for the insulation of the hot water delivery system (p. 5) to be verified during construction, before the walls are finished. Perhaps the insulation requirement might be subsumed within the hot water delivery performance test. This should be considered further when the revised criteria are republished for public comment.

4. The water budget instruction (p. 9) appears to be redundant. Since EPA has developed a water budget tool, why not simply require the use of its tool, including following its instructions?

5. Other significant issues may arise within the *Inspection and Certification Guidance*. However, since this document’s text is matched to individually numbered elements of the *Draft WaterSense New Homes Specification*, which itself is subject to further revision and reissuance for public comment, we anticipate that this initial version of the *Inspection and Certification Guidance* must be modified further, perhaps significantly. Therefore, we recommend that EPA issue a revised draft *Inspection and Certification Guidance* document concurrent with or shortly following the reissuance of the *Draft WaterSense New Homes Specification*. The Alliance looks forward to this revised draft and will consider offering further comments when it becomes available.

Topic: Draft Guidelines for Irrigation Audits of WaterSense Labeled New Homes

Comment: The Alliance for Water Efficiency has comments as well as a question.

Suggested Change (or Language):

1. What is the relationship of the irrigation system audit to the inspection of the new home, in timing and in cost?
 2. Regarding distribution uniformity, there are no criteria for what constitutes either passing or failing the test.
 3. Catch-can tests are known to be unreliable in shrub zones, due to the non-uniform profile of the vegetation.
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