

November 12, 2021

U.S. Environmental Protection Agency
Via Regulations.gov
Re: Draft EPA 2022-26 Strategic Plan (EPA-HQ-OA-2021-0403)

To whom it may concern:

The undersigned organizations and businesses write to encourage U.S. EPA to amend its draft [2022-26 Strategic Plan](#) to 1) identify the WaterSense program as an agency priority and 2) to establish a goal for increased funding that is needed to fulfill the program's goals. With drought and water scarcity becoming increasingly common across the nation, and the problem expected to worsen because of climate change, the WaterSense program is more important than ever.

WaterSense is the nation's flagship water efficiency program, with visible links to the private sector, public, and water utilities. Despite an annual budget of only \$3.1 million, WaterSense has made extraordinary strides. Since its inception in 2006, this voluntary public/private partnership has helped Americans save more than 5.3 trillion gallons of water – equivalent to the water used by all U.S. households in 200 days - and more than \$108 billion in water and energy bills.

WaterSense works with thousands of businesses and organizational partners, with more than 38,500 water-efficient products carrying the WaterSense label. Public and private utilities tailor successful water conservation programs around consumer use of WaterSense labeled products. And because of the nexus between water and energy use, the billions of gallons of water saved by WaterSense has also reduced energy use by billions of kilowatt hours and greenhouse gas emissions by hundreds of millions of tons.

The private sector strongly supports the WaterSense program, has demonstrated its desire to be participating partners, and is anxious to see faster progress towards the labeling of more product categories. In addition to a much smaller budget, WaterSense has some other important differences from its Energy Star cousin. No product receives a label without a performance test by a third-party certifier. No product receives a label unless it is 20% more efficient than the national efficiency standard for that product. And product specifications are based on field as well as laboratory analyses. Thus, a WaterSense labeled product provides the consumer with a guarantee of not only water efficiency, but quality performance.

Congress recognized the success and importance of WaterSense in 2019 by authorizing the program as part of America's Water Infrastructure and Improvement Act. That bill gave WaterSense statutory status for the first time. Unfortunately, the WaterSense budget remains far too small to address the pressing need for more water efficiency. We recommend that its funding be increased to at least \$10 million annually and that the EPA Strategic Plan reflect this goal. Additional funding is need to ensure program success but also to signal that the Administration is committed to addressing water scarcity and resiliency challenges in the face of climate change.

Thank you for your consideration.

Sincerely,