



COACHELLA VALLEY WATER DISTRICT

Established in 1918 as a public agency

GENERAL MANAGER
Jim Barrett

ASSISTANT GENERAL MANAGER
Robert Cheng

CLERK OF THE BOARD
Sylvia Bermudez

ASSISTANT GENERAL MANAGER
Dan Charlton

June 4, 2020

The Honorable Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
submitted via: www.regulations.gov

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

Dear Administrator Wheeler:

Coachella Valley Water District (CVWD) respectfully submits the following comments and support for the WaterSense program at U.S. Environmental Protection Agency (EPA). These comments are in response to the April 10, 2020 Federal Register Notice of Recent Specifications Review and Request for Information on the WaterSense Program.

1. Customer satisfaction criteria should not be incorporated into WaterSense product specifications.

CVWD echoes the position of The Alliance of Water Efficiency (AWE) that customer satisfaction criteria do not belong in WaterSense product specifications. However, there are reasonable uses for customer satisfaction information within the WaterSense program. Results from customer satisfaction surveys should inform the EPA about the public's opinions of the WaterSense brand and experiences with WaterSense labeled products in their homes and businesses.

Since the program's launch in 2006, WaterSense has sought to base its product specifications on laboratory tested measured values of performance. By adhering to these measured performance standards, the manufacturers who produce WaterSense products have had a level playing field in which specifications are uniformly understood. A vague, non-scientific measure such as customer satisfaction is likely to introduce uncertainty and bias into this stable and fair process. CVWD believes product-specific satisfactions research is best left to the marketplace and to the manufacturers themselves.

2. Customer satisfaction research for WaterSense should be limited to the WaterSense brand and to WaterSense partnerships.

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.

3. WaterSense specifications and products should be reviewed and revised, as appropriate, at regular intervals to adapt to changing technology.

The April 10 Federal Register notice it states that EPA has made the decision not to revise any WaterSense specifications at this time. CVWD supports the AWE position that it is important for specifications to move forward and advance in the future. EPA's decision not to revise any specifications is acceptable today, but must be reviewed regularly so that WaterSense products keep up with changing times and technology.

CVWD relies heavily on the WaterSense to label products that promote water efficiency in a uniform and controlled program. CVWD recommends WaterSense labeled products in its water conservation rebate program. In the arid Coachella Valley, preserving the source groundwater is critical. CVWD was excited to announce it had added high-efficiency washing machines and hot water recirculation pumps to its indoor rebate program. In just the first five months of offering these two new rebates, CVWD has processed 41 recirculating pump rebates and 49 washing machine rebates. These programs work. CVWD is thankful for the clear standards embedded in the program, which means staff do not need to spend time researching, reviewing and recommending products.

In closing, CVWD appreciates the opportunity to provide these brief comments. CVWD has also signed a longer coalition letter authored by AWE. If you have any questions, please reach out to me at kjohnson@cvwd.org or (760) 398-2661 ext. 3564.

Sincerely,



Kristen Johnson, J.D.
Government Affairs Specialist

cc: The Honorable Raul Ruiz (CA-36)