

**American Rivers
Milwaukee Metropolitan Sanitary District
National Association of Clean Water Agencies
NRDC**

January 31, 2008

Benjamin Grumbles
Assistant Administrator for Water
and
James Hanlon
Director
Office of Wastewater Management
U.S. Environmental Protection Administration
Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, NW.
Washington, DC 20460

RE: Stormwater criteria for the WaterSense New Homes Draft Specifications

Dear Assistant Administrator Grumbles and Director Hanlon:

We are writing about the draft specification being developed by U.S. EPA for the WaterSense New Homes initiative.

As members of the Steering Committee for Water Efficient Products, and parties interested in promoting water conservation and efficiency, we applaud the WaterSense program and strongly support EPA's efforts to make it a powerful and robust catalyst for reducing water waste. Recent droughts and water supply challenges throughout the nation underscore the need to help communities use water more efficiently.

We are pleased that EPA has undertaken an effort to develop specifications for water efficient new homes. In discussions with WaterSense staff, concern has been expressed that the specifications are largely silent on the important issues of stormwater management and water management techniques to reduce outdoor potable water use, such as rainwater harvesting. We understand that WaterSense staff have pledged to address these issues in follow-up guidance materials once the specifications have been set.

We feel strongly that it is important to include components on stormwater management in the WaterSense New Homes outdoor water efficiency specification criteria, not just future guidance, to effectively connect the supply and demand sides of the water efficiency equation.

Particularly in light of EPA's new commitment to green infrastructure, this is an important and supportable means for integrating goals for lowering water demand through reduced imperviousness, low-impact development and related non-structural stormwater approaches,

replenishing groundwater aquifers, and reducing the infrastructure burden on both water and wastewater treatment systems. Stormwater runoff and its impacts are a serious concern for many communities, and they are likely to be even more interested in adopting the WaterSense for New Homes program if it helps them put stormwater runoff to beneficial use for outdoor irrigation and groundwater recharge while also lessening water demand and infrastructure expense. In fact, Florida's Water Star Homes program and those in several other states have stormwater components that could serve as models.

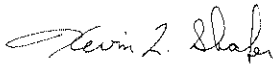
We appreciate the challenges in developing the outdoor water efficiency criteria, including regional differences in the appropriateness of rainwater harvesting. But we, and other experts active in the water efficiency arena, are ready and willing to assist EPA in putting together workable criteria related to imperviousness and low-impact stormwater practices for the WaterSense New Homes specifications that can take these differences into account.

Thank you for your attention to this request, and for all the work EPA is doing to promote water conservation and efficiency.

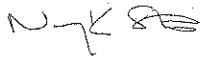
Sincerely yours,



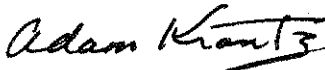
Betsy Otto
Senior Director, Healthy Waters and Water for Life campaigns
American Rivers



Kevin Shafer
Executive Director
Milwaukee Metropolitan Sanitary District



Nancy Stoner
Director, Clean Water Project
Natural Resources Defense Council



Adam Krantz
Managing Director of Government and Public Affairs
National Association of Clean Water Agencies

Cc: Sheila Frace, John Flowers, US EPA Water Sense program