

## **Comments of Ed Osann of NRDC on Section 3.0 – Outdoor Reference GPD.**

The presence or absence of an automatic irrigation system is a major unresolved issue. While mentioned as such in the cover memo, it is under the heading of “Future Improvement.” I believe strongly that further refinement is necessary and should be made before the initial version of the WER Index is finalized. Allowing any rated home with an automatic irrigation system to invoke a reference home similarly equipped in the extensive portions of the country where automatic systems have *not* been common ensures a great distortion in WER Index scores in such areas. The memo notes a consensus of support for this treatment, but also some dissent. I call attention here to a bit of new information that became public after most of the outdoor committee work was completed.

On November 17, the WaterSense Program released a draft proposal for pressure regulating irrigation sprinkler bodies. In the notice, EPA revealed information it has held since the 2005 DOE RECS survey that has not been made public regarding the installed base of automatic sprinkler systems. The Draft Specification for Spray Sprinkler Bodies Supporting Statement states that based on 2005 RECS data, “An estimated 13.5 million in-ground irrigation systems are currently installed in residential landscapes across the United States.” It is not clear whether the 13.5 million is a restatement of the 2005 count or whether a lower number from 2005 was projected to the present day to reach 13.5 million. At most, a count of 13.5 million sprinkler systems in 2005 would represent less than 18% of the 76 million occupied single-family homes in 2005. Given the prevalence of automatic irrigation systems in California, the Southwest, Texas, and Florida (where an automatic system in the reference home would be appropriate), the number of such systems in the remainder of the country must necessarily be vanishingly small –well under 10%.

Allowing any home anywhere in the country with an automatic irrigation system to be compared with a reference home with an automatic system will be a benefit that will not easily be withdrawn in a future revision to the WER Index, and I would have very serious reservations about NRDC endorsing such a scoring system. I urge that this issue be given more attention and a revised approach formulated before adoption later this year that can be credibly applied to the eastern portions of the country.