

[Date]

[Address]

[Address]

[Address]

Dear [Name]:

On behalf of [Company], I am pleased to submit comments regarding the [local City code].

We offer the following points for your consideration:

- Recommendation that [the City] incentivize the achievement of a third-party water efficiency rating, such as the Water Rating Index (WRI); and
- Recommendation that [the City] incentivize residential buildings that have earned the U.S. EPA's WaterSense Labeled Homes certification.

### **Water Rating Index (WRI)**

Especially considering local water shortages, we recommend that [the City] incentivize the achievement of third-party water efficiency ratings.

Water efficiency ratings are comparable to energy efficiency ratings; these ratings identify a property's overall water use compared to a reference building of similar size and basic configurations. Water efficiency ratings allow developers to access tools that can help them consider design choices that impact water use and present an overall score that can be used for comparison against similar properties. A water efficiency rating can offer confidence that a building will operate efficiently with limited impact on surrounding natural resources.

The *2020 National Green Building Standard ICC-700 (NGBS)* introduced the Water Rating Index (WRI) as a new optional path for newly constructed homes to demonstrate compliance with water efficiency criteria. A WRI score is a value between 0-100 and can be used to understand the operational costs of a given property. A WRI score indicates a property's total indoor and outdoor water use compared to a baseline. Just like with the Home Energy Rating System (HERS) and the Energy Rating Index (ERI), a lower score demonstrates higher efficiency. A WRI score of 70, for example, represents approximately 30% less water usage than the reference home design. Home Innovation offers certified WRI scores for all new residential buildings, regardless of their pursuit of NGBS Green certification. Achievement of a certified WRI score requires on-site verification and testing by an independent, third-party professional. Learn more at [www.HomeInnovation.com/WRI](http://www.HomeInnovation.com/WRI).

### **WaterSense Labeled Homes**

We recommend that **[the City]** also recognize homes and multifamily buildings that have earned EPA's [WaterSense Labeled Homes certification](#).

WaterSense labeled homes are verified and certified as at least 30% more water-efficient than typical new construction. The U.S. EPA has recognized [several third-party certification bodies and their respective methodologies](#) for administering home verification and certification. For example, Home Innovation Research Labs is a recognized HCO, with [compliance options based on the WRI and 2020 NGBS](#). Other HCOs include RESNET, CHEERS, and Green Builder® Coalition. By recognizing WaterSense, **[the City]** can offer builders flexibility to select the rating system and certification body of their choice, and **[the City]** and local residents can feel confident in the efficiency and performance of the labeled homes. Local builders and developers would also benefit from the marketing value associated with a highly-recognizable EPA label.

### **Summary**

Thank you for the opportunity to provide feedback.

We ask **[the City]** to encourage new residential buildings construction to earn a third-party water efficiency rating, like the WRI, and/or EPA's WaterSense Labeled Homes certification.

I am happy to provide additional information, as needed.

I look forward to working with you to promote third-party certified water efficient housing.

Sincerely,

**[Name]**