

April 23, 2020

The Honorable Matthew Lohr  
Chief, Natural Resources Conservation Service  
United States Department of Agriculture  
Washington D.C. 20250

Dear Chief Lohr:

On behalf of the more than 1,600 member companies of the Irrigation Association, thank you for your leadership in promoting conservation practices throughout United States agricultural production. The Irrigation Association supports the USDA's continued leadership in driving innovation and technology adoption, and we firmly believe that the NRCS plays a key role in driving both productivity and conservation through sustainable practices and technology adoption.

The Irrigation Association welcomed the opportunity to comment on the proposed practice code: 441, *Irrigation System, Microirrigation*, and practice code: 449, *Irrigation Water Management*. The mission of the IA is to *promote efficient irrigation*. Our partnership with the NRCS, including the promotion of practice codes, education, and TSP certification recognition, are essential to achieving this mission. As farmers continue to adopt pressurized irrigation system practices, practice codes 441 and 449 become more important by the year. Our comments below are meant to reflect how best to implement irrigation water management plans, as well as drip and micro irrigation technology, at the farm level to achieve conservation and productivity goals of the farmer.

### **Practice Code 441: Irrigation System, Microirrigation**

#### **PURPOSE**

The Irrigation Association feels that the following should be added under the "purpose" section:

- "Increase productivity through the efficient application of irrigation water on or below the soil surface."
- "Prevent contamination of ground and surface water by efficiently and uniformly applying chemicals and/or crop nutrients." – NOTE: this will replace the current second bullet, "prevent contamination of ground..."

#### **CRITERIA**

##### ***General Criteria Applicable to All Purposes***

- Remove "deep percolation" as an allowance for a reasonable water loss. As stated in the next sentence, "if water test results indicate a need, include adequate water for leaching..."

### **Emitters**

- The Irrigation Association believes that the CV requirements for online emitters at .05 and inline emitters at .07 are not practical nor widely achievable, given the products on the market. The Irrigation Association believes that this number should be no more than .03 for each.

### **Operating Pressures**

- Section currently states “maintaining flow velocities at no more than 5.0 ft./second in all mains and submains during all phases of operation...” This should recognize what is stated later under *System Flushing*, “do not exceed 7.0 ft./sec in submains or manifolds...”

### **Filters**

- The IA believes that the filters should be designed for a maximum head loss of 3 psi, rather than 5 psi. This change will cushion the filter station from being in constant backflush during poor water quality conditions.

### **Operations and Maintenance**

- Regarding flow meters in the first bullet add to read, “check the flow meter reading against the design at least three times per year for accuracy and flow degradation.” This will help the farmer determine a problem before it becomes larger and more costly.
- Change “flush lateral lines at least annually,” to “Laterals should be flushed at least three times during the season (beginning, middle and end).”
- Change, “...A pressure drop (or rise) may indicate a problem,” to read, “A pressure drop (or rise), along with corresponding increase or decrease in system flow, may indicate a problem.”

## **Practice Code 449: Irrigation Water Management**

### **PURPOSE**

The Irrigation Association feels that the following should be added under the “purpose” section:

- “Increase productivity of the farmer through efficient irrigation water management.”

### **CRITERIA – General Criteria Applicable to All Purposes**

- Change, “...computerized irrigation scheduling...” to include, “(e.g. remote telemetry data systems coupled with cloud-based irrigation scheduling using imaging and/or the soil-water balance method.)”

Thank you for your consideration. If you have any questions or need any additional information, please feel free to contact me at [johnfarner@irrigation.org](mailto:johnfarner@irrigation.org) or 703.536.7080.

Sincerely,



John Farner  
Government and Public Affairs Director