

March 19, 2021

Andrew deLaski
Executive Director
Appliance Standards Awareness Project

Dear Mr. deLaski,

On behalf of the 1,300 member companies of the Irrigation Association, thank you for your efforts to promote energy and water savings, along with monetary savings and environmental benefits, in the marketplace through the promotion of standards in policies and legislation. Through the IA's mission of promoting efficient irrigation, we stand with you in principle and stand by our industry's technologies, products and services as solutions to many of the water and energy challenges facing the United States.

We also appreciate our previous conversations in discussing the inclusion of the WaterSense-labeled pressure regulating spray sprinklers in your state advocacy efforts. Focusing on water-efficiency, along with energy-efficiency, is imperative to not only mitigate the effects of climate change, but also ensure we are not wasting precious natural resources.

With that said, the Irrigation Association respectfully requests that ASAP not include the pressure regulating sprinkler mandates that are included in your model legislation. Make no mistake, the IA believes in this technology. However, we believe in the use of this technology only where needed.

As the legislation is written now, the mandate of this technology places an undue economic burden on many consumers. In many cases, pressure regulating sprinklers are twice as much money as efficient sprinklers that do not have pressure regulation. In addition, pressure regulated spray bodies require a much higher inlet pressure to optimize performance. For projects with low pressure conditions, a pump will now be required to provide adequate pressure to the spray heads. The inclusion of a pump installation to support pressure regulated spray bodies requires additional infrastructure, electrical power, installation, and maintenance costs, which exponentially increases the cost of projects. This directly goes against ASAP's mission of "monetary savings."

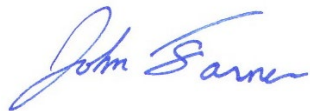
In addition to the undue financial pressure placed on consumers, the label developed by WaterSense was developed to be voluntary. While the voluntary label was based on the ASABE/ICC 802-2014 Landscape Irrigation Sprinkler and Emitter Standard, the standard is not performance-based. The voluntary label of WaterSense sets the performance criteria to earn the label to enhance the market for this technology, where appropriate. The Irrigation Association supports the WaterSense program as a voluntary program.

Regarding water pressure, in many localities throughout the United States, pressure is not an issue. Where it is an issue, and the structure (building, home, etc.) does not have a pressure valve or a master regulator, pressure regulating sprinklers are the answer. But, they are not the answer for every commercial and residential irrigation system that exists or is being built.

The final point we will highlight in this letter is one of stifling innovation. The irrigation industry is experiencing a renaissance of irrigation innovation. We are seeing new and different technologies enter the market on a regular basis. We cannot support a legislative system that mandates different technologies once they are developed and introduced in the marketplace. Irrigation technologies are different than other water technologies. A system that is appropriate in Arizona is different than a system that is appropriate in Maryland. Policies need to recognize this. The IA supports localities making the right decisions based on their unique climate and water variables, including pressure. We cannot support model legislation that is adopted the same way in every state that does not give the flexibility to localities and consumers to make the right decisions based on these local variables.

Again, we look forward to partnering with ASAP on promoting efficient irrigation technologies through sound public policy. We cannot in good conscious support the mandate of pressure regulating sprinklers, based on our concerns addressed above. If you have any questions regarding our efforts and concerns, please contact me at johnfarner@irrigation.org or 703.536.7080.

Sincerely,



John Farner
Industry Development Director

Cc: Marianne DiMascio, State Policy Manager, ASAP