March 26, 2020

The Honorable Christopher Krebs  
Director, Cybersecurity and Infrastructure Security Agency  
U.S. Department of Homeland Security  
245 Murray Lane  
Washington, DC 20528-0380

Dear Director Krebs:

The Irrigation Association is the national trade association representing companies that manufacture, distribute, install, and maintain agricultural, commercial, and residential irrigation systems and technologies. With a mission to “promote efficient irrigation,” our goal is to protect our nation’s water infrastructure and natural landscapes, while ensuring we have a safe and secure food supply, especially during times like these.

First and foremost, thank you for your recognition American agriculture and those industries that support farmers in producing our nation’s food, feed, fuel and fiber are part of America’s critical infrastructure. You can rest assured that the agricultural irrigation technology manufacturers, dealers, designers, consultants, as well as the rest of the complete supply chain, stand with you in leading our nation through this public health emergency.

In addition to food and agriculture, CISA also highlights “public works,” specifically, “workers such as plumbers, electricians, exterminators, and other service providers who provide services that are necessary to maintaining the safety, sanitation, and essential operation of residences,” as critical infrastructure. While the Irrigation Association supports public works as a part of America’s critical infrastructure, we feel that commercial and residential irrigation professionals, who manage the conveyance of water, often from the public water supply, should be highlighted in this section.

Commercial and residential irrigation is a core component of America’s water infrastructure. While many homes and commercial properties rely on the public water supply for irrigation (as much as 50 percent of residential and commercial water used in certain parts of the United States is through commercial and residential irrigation), the science and engineering behind an irrigation system keeps
our public water supply and the customer’s water supply safe, while ensuring our communities are safer and cleaner through a living managed landscape.

With the public’s health, safety and welfare in mind, we believe that commercial and residential irrigation should be included in America’s critical infrastructure:

- We are entering the spring months when many irrigation systems will be turned on by the homeowner/property manager. It is imperative that these systems are professionally inspected (in accordance with state and local codes and regulations), ensuring there are no leaks and the backflow prevention device is operating properly. **This simply protects a home’s plumbing system as well as American’s public water supply.**
- Properly maintained landscapes and greenspaces lessen crime and reduce injuries, reducing the strain on our already-stressed health care system.
- **Properly run irrigation systems do not waste water. We need to ensure water is available for all uses during this public health emergency. Ensuring irrigation systems are doing their job and running properly is an essential component in protecting our public water supplies.**

Our industry is taking significant steps to ensure their businesses are being run in accordance with the Centers for Disease Control and Prevention, as well as state and local guidelines. The Irrigation Association continues to be a resource for our members, the industry and the government in protecting our public’s health.

Unfortunately, some irrigation professionals are told by state local police officials in some states to not perform any critical irrigation line work, as the irrigation professionals are trying to protect the state’s, as well as their commercial and residential customers’, water supplies. **We hope that you will clarify that irrigation professionals, like plumbers, are essential for the health and wellbeing of all Americans.**

We stand with you in addressing this public health emergency, while providing these critical infrastructure services.

Sincerely,

John Farner
Government and Public Affairs Director