

DOCKETED

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My name is Mike Baron and I worked in the landscape & turf irrigation industry from 1980 to 2018. As way of credentials, I've been recognized by the Irrigation Association, the California Landscape Contractors Association as well as the Green Industry Hall of Fame for my contributions to the irrigation industry.

I would like to make two points regarding the California Code of Regulations, Title 20, section 1605.3(x)(1)(a) which requires that all spray sprinkler bodies sold or offered for sale in California be pressure regulating models.

1. I urge the CEC to coordinate with EPA WaterSense and develop a complementary testing procedure that would enable other spray sprinkler body technologies, such as the Internal Flow Regulation technology, to qualify to be sold in California. Why? Because the Internal Flow Regulation technology, today, achieves the CEC's stated objective to eliminate "excessive flow rates, water lost to misting, wind drift and evaporation; and poor uniformity;" all caused by excessively high pressure. A second testing protocol followed by successfully approved new technologies, will result in increased competition in the marketplace and deliver lower prices, over time, to customers.

2. My second point pertains to the value and efficacy of empirical data as a means of approving a spray sprinkler body technology. Rather than rely exclusively on a laboratory testing protocol, why not consider accepting in-field test results? If a technology does not pass the current EPA WaterSense testing protocol, but clearly achieves the CEC's end objective of eliminating all water waste from excessively high pressure, why not approve that technology - even if that approval is only provisional. This would provide ample time to collect feedback from end customers who prefer using the provisionally approved technology and provide greater choice to customers

Thank you for your time.