

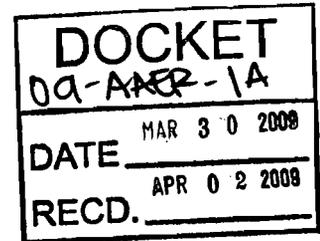


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March 30, 2009

Lorraine White, Energy Specialist III
California Energy Commission
1516 9th Street, MS 42
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RE: 2009 Irrigation Equipment Performance Standards and Labeling Requirements
Proceeding Scope (Docket Number 09-AAER-1A)

Dear Lorraine:

The Smart Water Application Technologies initiative (SWAT) addresses a major opportunity to significantly reduce overall water use by households nationwide by improving landscape irrigation efficiency. Smart water application technologies are proven and effective irrigation products for improving outdoor water use efficiency for residential and light commercial irrigation systems.

SWAT started in 2002 at the request of leading water providers concerned with the reliability and product performance of the new controller technologies entering the market. The result was a landmark meeting of water suppliers and irrigation industry representatives.

SWAT allies water purveyors, irrigation professionals, and related professional industry associations who research stakeholder priorities and promote technological innovations that advance efficient water use. Key goals are developing performance testing protocols and marketing tools for efficient irrigation products and to promote market acceptance. SWAT is a voluntary program administered through the Irrigation Association.

Testing protocols are required for irrigation industry products to qualify for the EPA WaterSense® labeling. Once EPA unveils labeling for irrigation products, it is expected that water providers will embrace the products as they currently do for SWAT-tested products. With EPA's consumer reach and marketing, plus that of water providers, WaterSense-labeled products will immediately gain recognition and prominence in the market.

The first irrigation product category selected for protocol and marketing development was climatologically-based controllers. The process developed for this initial category was detailed and open to a public process from its inception. This proven process has been applied to other SWAT product categories currently in development, including soil moisture sensor-based controllers and rain sensors.

The SWAT initiative is organized into three primary areas: a Promotions Working Group, a Technical Working Group and an Executive Leadership Group. The working groups are set up to ensure that major stakeholders are represented and specific process guidelines are followed. Each group holds monthly conference calls. An annual SWAT meeting, open to the public, is

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held in conjunction with the Irrigation Show. Additional meetings are scheduled to involve specific stakeholders such as manufacturers, water providers, contractors, etc., as necessary.

SWAT follows the same procedure used for reviewing ISO standards with the exception that no formal vote is taken at the end of the process. A first draft for a testing protocol is developed by scientists and researchers well-versed in that particular technology. The draft is posted for a 90-day public comment period at www.swatirrigation.org, a dedicated section of the IA web site. Electronic notifications are sent to professionals from the water provider, landscape and irrigation industries, as well as others who have indicated an interest in the program. All stakeholders are invited to read and comment.

A succession of drafts may be viewed on the web by product category at:
http://www.irrigation.org/SWAT/Industry/draft_protocols.asp.

Using climate-based controllers as an example, it's easy to track the process on its web page:
<http://www.irrigation.org/SWAT/Industry/default.aspx?pg=drafts-controller.htm>.

Each draft document is posted along with public comments. Once the comment period has ended, a working group compiles the comments into a summary review document where the comments are accepted or rejected and explanations provided. Accepted comments are incorporated into the next draft. Successive drafts are posted, each following the same process. For climate-based controllers, product testing began with the fourth draft with minor changes made to the following drafts.

SWAT policy dictates it conduct a major protocol review every three years, once a testing protocol is completed. A major review for climate-based controllers was conducted in 2008 (Review Draft 7), which was posted for a 90-day public comment period. An eighth draft was posted with a 30-day review as changes were not technical in nature. This version was the first to be sent to EPA who will determine the final criteria and process for WaterSense labeling of climatologically-based controllers.

Since its first meeting in 2002, SWAT has already had a significant impact on landscape water efficiency efforts. SWAT has supported landscape water efficiency by:

- Developing accurate, science-based performance test protocols and reporting for water-efficient irrigation products.
- Educating water provider professionals, landscape contractors, home developers, specifiers, homeowners and small businesses about the water-saving potential of advanced irrigation technologies.
- Producing professional, customizable web and print materials about water-efficient irrigation products for water providers to use in contractor and customer outreach programs.
- Encouraging partnerships between water providers, irrigation industry representatives, government agencies and landscape professionals in water resource management.

In addition to the soil moisture sensors and rain sensors in development, SWAT looks forward to repeating the process for other proven effective irrigation products, including but not limited

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to: matched precipitation rate nozzles, flow control nozzles, pressure regulators, multi-stream multiple trajectory nozzles, high flow shut-off safeties and micro irrigation technologies.

SWAT is helping to accelerate the move from traditional irrigation components to smart water application technologies. Your interest is appreciated. SWAT would be happy to answer any additional questions, either in writing or by providing a representative to attend an upcoming meeting or call.

Very truly yours,

A handwritten signature in black ink, appearing to read "Brian Vinchesi". The signature is fluid and cursive, with a large initial "B" and "V".

Brian Vinchesi, CIC, CID, DGIA, CLIA, CLIM, CWCM-L
President, Irrigation Consulting, Inc.
Chairman, SWAT Program