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March 30, 2009

Lorraine White, Energy Specialist III  
California Energy Commission  
1516 9th Street, MS 42  
Sacramento, CA 95814

RE: 2009 Irrigation Equipment Performance Standards and Labeling Requirements Proceeding  
Scope (Docket Number 09-AAER-1A)

Dear Lorraine:

The California Energy Commission is embarking upon a process that will have a pronounced impact on the future of landscape irrigation not only in California, but across the country. For years, California has taken a leadership role in establishing regulatory boundaries affecting landscape water use that have been significant drivers in the development of many innovative irrigation products and practices. Assembly Bill 1881 challenges CEC and the State of California to lead the irrigation market further down the path of efficiency by creating specific standards for controllers, sensors, emission devices and valves used in irrigation systems to reduce wasteful, uneconomic, inefficient or unnecessary use of water and/or energy.

The capability to deliver efficient irrigation is driven by some key basics:

- The ability to distribute water in a uniform fashion
- The ability to apply water accurately (hitting targeted plants without watering non-targeted areas)
- Conveyance of water to plants without losses to leaks or excessive friction
- Controlling irrigation cycles in concert with plant needs and soil infiltration rates

Consideration for the applicability of these basics should facilitate the cultivation of necessary core standards that could become the basis for each specific label.

The current marketplace already has many of the tools necessary to fulfill the legislative mandate of AB1881. Water use efficiency test protocols have previously been developed by IA and a broad cross section of stakeholders through the Smart Water Application Technologies initiative or "SWAT." "Smart" irrigation controllers were the first challenge for SWAT and we are very pleased to have a repeatable and accurate means of evaluating irrigation controllers that could easily become the basis for a significant portion of CEC's label development. The SWAT initiative is ongoing and will continue to be an excellent resource for CEC. (Visit [www.swatirrigation.org](http://www.swatirrigation.org).)

This label development process is off to an excellent start. You have served CEC, the irrigation industry and California residents well by creating an open and visible path for collaboration. This challenge is very much in line with the Irrigation Association's mission which is simply to "promote efficient irrigation." We look forward to supporting our core mission by assisting you with this process in any way practical.

Sincerely,

Stephen W. Smith  
Chairman, Aqua Engineering, Inc.  
President, Irrigation Association