



USA

April 8, 2009

California Energy Commission  
Docket Unit  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814

<b>DOCKET</b>	
<b>09-AAER-1A</b>	
DATE	April 08 2009
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Reference docket number: 09-AAER-1A

Dear Commissioners,

Netafim Irrigation Inc., located in Fresno, California, has since 1965 developed the concept and advancement of drip irrigation technology primarily in agriculture, nursery, greenhouse and landscape applications. As a concerned manufacturer of Drip and Micro Irrigation equipment, we recognize the water savings opportunity that can be realized by employing this technology, and therefore encourage the California Energy Commission's Efficiency Committee to elevate the consideration of drip irrigation along with other appliances (pop-ups, rotors and other various watering devices).

As early as 1991, we began to broaden the use of this technology to include landscape environments. Initially, the landscape marketplace believed our products were limited to shrub and groundcover bed areas. Netafim USA set on a course to prove its use in turf grass areas, and in the process, we, in fact, helped to pioneer subsurface drip irrigation (SDI) in this application.

Sub-Surface Drip Irrigation (SDI) is achieved using extruded polyethylene tubing about 5/8" in diameter with drip emitters inside the tubing. Deploying parallel rows of tubing 12" to 24" apart and offering a selection of drip emitter spacing's and flows, help match the product to a wide range of soil and plant requirements. Because the tubing is buried, **water runoff** and **overspray** and **virtually all evaporation is eliminated**. Further, the flexible tubing allows the adaptation to all sizes and area shaped landscapes, with the drip emitters relatively close together and capillary movement of water laterally, **water distribution is nearly perfect**. These factors make SDI the most effective and efficient methods of irrigating not only turf areas but all landscape situations. Since turf applications make up nearly 70% - 80% of the irrigated area, the inclusion of drip technology needs to be considered for all applications.

As evidence of our success and claims these observations were published after one year's testing on one acre of turf grass at California Fresno State University:

*Subsurface Drip Irrigation (SDI) on Turf grass: A University Experience  
By D. F. Zoldoske, S. Genito, G. S. Jorgensen, Center for Irrigation Technology  
California State University, Fresno California, January 1995*

*“Operation and Maintenance*

- 1) The SDI system required zero hours of maintenance during the 1994 irrigation season. The conventional sprinkler system required eight hours of maintenance to repair/replace damaged sprinkler heads due to mowing and vehicle traffic during this time.*
- 2) The SDI system received zero complaints due to water run-off. The conventional irrigation system received six complaints due to water running on sidewalks and over spray.*
- 3) Less water was applied to the turf grass using the SDI system than the turf grass irrigated using the conventional sprinkler system.”*

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*Concluded:*

*“The use of SDI to irrigate turf grass has passed from the stage of university research to commercial application.”*

Netafim USA has, through education, product development and industry promotion, been proving drip is the most efficient form of irrigation available for almost all landscape environments and conditions. We see the importance of establishing performance standards that help the public and trade industry participants select products that can save water. We stand ready to assist the California Energy Commission's Efficiency Committee in understanding the technical and practical establishment of performance standards and labeling requirements for landscape irrigation equipment.

Sincerely,

Michael Dowgert, PhD / Market Manager  
Netafim USA