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Subject: 2009 Irrigation Equipment Performance Standards
and Labeling Requirements Proceeding Scope

RE: Input on performance standards for landscape irrigation controllers

April 1, 2009

From: Andrew Davis, President of Accurate WeatherSet

1. **Do NOT use the IA/SWAT protocol to set standards for irrigation controllers. Instead, use the multi-year field testing of ET controllers funded by Prop 13.**

The IA/SWAT testing protocol is only testing one controller from each manufacturer and only testing that one controller for 30 days. **Thirty days is too short to measure water conservation.** Any timer, even dumb timers from the 1980s, could be programmed to "pass" this 30 day test.

The IA/SWAT protocol contains crop coefficients for each month of the year which shows that some plants need 40% less water in the winter. The 30-day test period cannot test the controllers for this 40% water savings over 12 months. Also, the 30-day test cannot test for water conservation due to changes in seasonal weather.

The Prop 13-funded, multi-year field studies of thousands of controllers can test for the 40% water savings over time and can test for water conservation due to changes in seasonal weather.

2. **The programming and installation of the SWAT testing is NOT realistic.** The one controller from each manufacturer that IA/SWAT protocol tests is programmed by the engineers of the manufacturer and installed by either the manufacturer or highly literate professionals at Cal State Fresno. The Prop 13-funded, multi-year field studies involve **installation and programming** of thousands of controllers by **homeowners and contractors**. Results from these Prop 13-funded tests reveal water savings achievable by homeowners and contractors. The IA/SWAT 30-day testing of one controller from each manufacturer has no value indicating potential water savings from installation and programming by homeowners and contractors.
3. **The Prop 13-funded studies are showing that some controllers that did well in 30-day SWAT testing actually INCREASED water consumption when installed and operated by homeowners or contractors for multiple years. With other controllers, no water was conserved.** The people of California spent millions of dollars on these field tests. The results should be honored and used to select controllers for general sales in California starting in 2012.
4. **In the interest of water/energy conservation, I propose that only controllers showing significant water saving in Prop 13-funded studies are allowed general sales in California starting in 2012.**
5. **In the interest of innovation, I propose that the DWR continue funding multi-year studies of new ET controllers as they may emerge after 2011.** SWAT testing may be used to qualify these new controllers/technologies for meaningful multi-year field testing.