

Agricultural Water Management Compliance

Att1_DG_Eligible_10of14

South San Joaquin Irrigation District is an agricultural water supplier that will receive funding from this grant.

South San Joaquin Irrigation District
Sam Bologna, Engineering Department Manager 209/249-4617
SBologna@ssjid.com

SSJID's AWMP Conformance Letter is presented as Figure 12. A follow-up clarification e-mail is presented as Figure 13.

Figure 12 - SSJID AWMP Conformance Letter

<p>STATE OF CALIFORNIA - CALIFORNIA NATURAL RESOURCES AGENCY</p> <p>DEPARTMENT OF WATER RESOURCES 1416 NINTH STREET, P.O. BOX 942836 SACRAMENTO, CA 94236-0001 (916) 653-5791</p>	<p>EDMUND G. BROWN JR., Governor</p> 
<p>November 22, 2013</p>	
<p>Mr. Jeff Shields General Manager South San Joaquin Irrigation District Post Office Box 747 Ripon, California 95366</p>	<p>RECEIVED JAN - 2 2014 SSJID</p>
<p>Dear Mr. Shields:</p> <p>The Department of Water Resources (DWR) has completed its review of your Agricultural Water Management Plan for the purpose of meeting the requirements of Water Code Sections 10608.48 (a)-(d), and 10800 <i>et seq.</i>, Part 2.8. We find that your plan generally meets the requirements of the code sections.</p> <p>We note, however, that additional details required under Section 10608.48(d) need to be addressed. Specifically:</p> <p style="padding-left: 40px;">"...an estimate of the water use efficiency improvements that have occurred since the last report, and an estimate of the water use efficiency improvements estimated to occur five to 10 years in the future."</p> <p>DWR recommends that when you update this plan in 2015 that these estimates are included as part of the descriptions of the water use efficiency practices. These estimates may be quantitative or qualitative, based on availability of data.</p> <p>DWR's review of plans is limited to assessing whether suppliers have addressed the required legislative elements. In its review, DWR does not evaluate or analyze the supplier's plan data, projections, or water management strategies. This letter is meant to acknowledge that the supplier has addressed these requirements. The results of the review will also be provided to the DWR's Water Use and Efficiency grants program and the Financial Assistance Branch, and to any other state agency that offers grants and loans.</p> <p>DWR intends to update its AWMP Guidebook by the end of 2014 in order to further assist water suppliers in preparing their plans.</p> <p>If you have any questions regarding the review of the plan, please feel free to contact Marty Berbach at (916) 651-9216 or martin.berbach@water.ca.gov.</p> <p>Sincerely,</p> <div style="text-align: center; margin-top: 20px;">  </div> <p>Kent Frame Program Manager II Water Use and Efficiency Branch Division of Statewide Integrated Water Management</p>	

Figure 13 - SSJID AWMP Conformance Clarification

From: Berbach, Martin@DWR <Martin.Berbach@water.ca.gov>
Sent: Tuesday, February 04, 2014 9:08 AM
To: Sam Bologna; Frame, Kent@DWR
Cc: Jeff Shields; Bryan Thoreson; Rosmaier, Kim@DWR
Subject: RE: Response to November 22, 2013 letter re: AWMP

Mr. Bologna,

I apologize for the significant oversight in our review. This item was not captured in our review. You are correct that you have addressed this item as required under 10608.48(d). We will send an amended letter that acknowledges this. Thank you for your patience.

Marty Berbach, Ph.D.
 Senior Environmental Scientist
 Water Use and Efficiency Branch
 Dept. of Water Resources
 901 P Street, Room 313A
 Sacramento, CA 95814
 916-651-9216
 FAX 651-9849
 E-mail: Martin.Berbach@water.ca.gov

From: Sam Bologna [<mailto:sbologna@ssjid.com>]
Sent: Tuesday, February 04, 2014 7:54 AM
To: Berbach, Martin@DWR; Frame, Kent@DWR
Cc: Jeff Shields; Bryan Thoreson
Subject: Response to November 22, 2013 letter re: AWMP

Mr. Frame and Mr. Berbach,

Thank you for your letter of November 22 addressed to our General Manager, Jeff Shields (attached). We appreciate your review of our AWMP and were pleased to read that "our Plan generally meets the requirements of the applicable Water Code sections." We also understand the letter to say that our plan meets the legislative requirements (in the fourth paragraph), "...letter is meant to acknowledge that the supplier has met these [legislative] requirements."

However, we believe the letter contains a significant inaccuracy. Specifically, the letter states "that additional details under Section 10608.48(d) need to be addressed" including "an estimate of the water efficiency improvements that have occurred since the last report, and an estimate of the water efficiency improvements estimated to occur five to 10 years in the future." As noted in the letter, these estimates may be quantitative or qualitative, based on availability of data.

First, we believe that our AWMP fully addresses this water code section in Section 7.5 beginning on page 7-17, including Table 7-9 on page 7-25, which was specifically prepared to address this requirement. (also attached). Noting that the estimates of water efficiency improvements may be quantitative or qualitative, based on availability of data, we direct your attention to the top of page 7-24 in our plan, which states:

"In order to more explicitly report an estimate of WUE improvements that have occurred since the last AWMP and an estimate of WUE improvements expected to occur five and ten years in the future, SSJID has estimated the qualitative magnitude (expressed as None, Limited, Modest, or Substantial in order of increasing relative magnitude) for the targeted flow paths associated with each EWMP relative to the applicable WUE improvement categories identified in Table 7-8."

We have been considering sending a letter to formally request that DWR correct this inaccuracy. However, we thought it best to first contact you informally to ask that you review the information on page 7-25 of our Plan, and reconsider whether additional details need to be addressed in our plan with respect to Section 10608.48(d). If you concur that our plan does adequately address this section, an acknowledgment in the form of a revised letter to that affect would be greatly appreciated.

We look forward to your reply.

Best regards,

*Sam Bologna
Engineering Department Manager
South San Joaquin Irrigation District
P.O. Box 747
Ripon, Ca. 95366
(209) 249-4617 direct phone
(209) 249-4651 direct fax
(209) 456-1574 cell phone*

<November 22 Letter.PDF>
<Section 7.5 of AWMP.PDF>