

**From:** [Kari Fisher](#)  
**To:** [Schneider, Joanne@Waterboards](#); [Riverside County Farm Bureau](#)  
**Cc:** [Cross, Wanda@Waterboards](#); [Theisen, Ken@Waterboards](#)  
**Subject:** RE: WORKING DRAFT CWAD  
**Date:** Monday, June 06, 2016 12:00:39 PM

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My apologies—I mistyped the abbreviation for the conditional waiver and it should be CWAD.  
-Kari

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**From:** Kari Fisher  
**Sent:** Monday, June 06, 2016 11:59 AM  
**To:** 'Schneider, Joanne@Waterboards' <Joanne.Schneider@waterboards.ca.gov>; Riverside County Farm Bureau <pastor@riversidecfb.com>  
**Cc:** Cross, Wanda@Waterboards <Wanda.Cross@waterboards.ca.gov>; Theisen, Ken@Waterboards <Ken.Theisen@waterboards.ca.gov>  
**Subject:** RE: WORKING DRAFT CWAD

Good morning Joanne,  
Thank you for providing us with the opportunity to review the latest draft of the CAWD. With regard to the components to the eNOI, we briefly talked about the possibility to making certain components confidential if a coalition exists. Can the CAWD be revised to include references to such protections or specify the difference in reporting requirements for individuals versus members who join a third party group?

For example, the Central Valley Regional Water Board's irrigated lands regulatory program WDRs for coalition groups provide the following requirements which provide the Regional Board with ample information:

Under the coalition WDRs, the coalition submits the following membership list to the Regional Board:

The third-party shall submit a list of its Members to the Central Valley Water Board within 180-days of receiving an NOA from the board and then annually by 31 July of each year (beginning the year following initial submission of the list). The membership list shall identify Members. The list shall also identify growers that have had their membership revoked and Members that are pending revocation. The membership list shall contain, at a minimum, the following information for each member: all parcel numbers covered under the membership, the county of each parcel, the section, township, and range associated with each parcel, the number of irrigated acres for each parcel, the Member's name, mailing address, the contact name and phone number of the individuals authorized to provide access to the enrolled parcels, the name of the farm operator for each parcel, if different from the Member, and identification of each parcel that is part of a Small Farming Operation, if applicable. In lieu of providing Members' phone numbers as part of the membership list, the third-party may provide the office contact name(s) and phone number(s) of a representative of the third-party.

Each member also completes a Farm Evaluation which has information requested in the CAWD

eNOI, such as name, APN, crop, irrigation practices, etc. The Farm Evaluation is submitted to the coalition (as well as a copy stays on farm) who aggregates the information at a township level and submits an aggregated summary to the Regional Board. The Regional Board receives individual data at the township level and also maintains the authority to inspect the Farm Evaluation.

Central Valley Coalition WDR requirements:

**Report Component (18) – Summary of Management Practice Information**

The third-party will aggregate and summarize information collected from Farm Evaluations. The summary of management practice data must include a quality assessment of the collected information by township (e.g. missing data, potentially incorrect/inaccurate reporting), and a description of corrective actions to be taken regarding any deficiencies in the quality of data submitted, if such deficiencies were identified. In addition to summarizing and aggregating the information collected, the third party will provide the individual data records used to develop this summary in an electronic format, compatible with ArcGIS, identified to at least the township level.

Farm Evaluation components:

The link below is the template that all coalition members must fill out. At a minimum, the template was required to contain:

- Identification of the crops grown and acreage of each crop.
- Location of the farm.
- Identification of on-farm management practices implemented to achieve the Order's farm management performance standards. Specifically track which management practices recommended in management plans have been implemented at the farm.
- Identification of whether or not there is movement of soil during storm events and/or during irrigation drainage events (sediment and erosion risk areas) and a description of where this occurs.
- Identification of whether or not water leaves the property and is conveyed downstream and a description of where this occurs.
- Location of in-service wells and abandoned wells. Identification of whether wellhead protection and backflow prevention practices have been implemented

I am happy to discuss this with you further at your convenience.

Thank you,

Kari

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**From:** Schneider, Joanne@Waterboards [<mailto:Joanne.Schneider@waterboards.ca.gov>]  
**Sent:** Friday, May 27, 2016 9:53 AM  
**To:** Riverside County Farm Bureau <[pastor@riversidecfb.com](mailto:pastor@riversidecfb.com)>; Kari Fisher <[kfisher@CFBF.com](mailto:kfisher@CFBF.com)>  
**Cc:** Cross, Wanda@Waterboards <[Wanda.Cross@waterboards.ca.gov](mailto:Wanda.Cross@waterboards.ca.gov)>; Theisen, Ken@Waterboards <[Ken.Theisen@waterboards.ca.gov](mailto:Ken.Theisen@waterboards.ca.gov)>  
**Subject:** RE: WORKING DRAFT CWAD

I have attached another version of the draft CWAD that should be used for your review, rather than the version I sent yesterday. I apologize for any inconvenience.

Joanne

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**From:** Schneider, Joanne@Waterboards  
**Sent:** Thursday, May 26, 2016 3:32 PM  
**To:** [Pastor@RiversideCFB.com](mailto:Pastor@RiversideCFB.com); [kfisher@CFBF.com](mailto:kfisher@CFBF.com)  
**Cc:** Cross, Wanda@Waterboards; Theisen, Ken@Waterboards  
**Subject:** WORKING DRAFT CWAD

Good afternoon. Thank you for your time this afternoon. Attached, as promised, is the latest working draft of the CWAD. Please bear in mind that additional changes are likely to be made before this is released to wider distribution.

Your specific comments, and specific recommendations for changes (e.g., to address confidentiality via Coalition Group) would be welcomed.

Joanne

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