Urban Water Manager  
City of El Centro  
1275 W. Main Street  
El Centro, CA 92243  

Dear Urban Water Manager,

Subject: UWMP and WSA Review

As a result of a recent determination by the California Department of Water Resources that the Imperial Irrigation District (IID) is not required to comply with the Urban Water Management Plan Act requirements (see attached letter), this letter will serve as official notice that the 2000 Urban Water Management Plan for Imperial Irrigation District and the Cities of Brawley, Calexico, and El Centro (UWMP) should be considered obsolete and no longer supported by IID.

While IID did convey to local municipality staff that IID was not required to comply with the Urban Water Management Planning Act, IID has been made aware of various local documents that continue to reference IID’s 2000 UWMP or that rely on information from this document that is no longer appropriate. Given the dynamic nature of water supply data in general, and more specifically IID’s adoption of the Quantification Settlement Agreement (QSA) in 2003 and the subsequent and ongoing implementation of related water conservation and transfer projects, please realize that water management issues continue to evolve and historic data may not be reflective of the current situation or future trends.

Finally, IID is cognizant that as a result of SB 610 (Public Resource Code § 21151.9, Water Code §§ 10910 et seq. and 10631 et seq.) and SB 221 (Government Code §§ 65868.5, 6645.3, and 66473.7, and Bus. & Prof. Code § 11010), effective January 1, 2002, the Cities and County must consider Water Supply Assessments and Water Supply Verifications as part of the process for determining whether sufficient water supplies exist for the new demand created by new development projects that are before the Cities and County for project approval. It is important to recognize that because IID does not have a current, and will not in the future produce any new Urban Water Management Plans, the Cities and County will not be able to rely upon or incorporate information from an IID Urban Water Management Plan into either their SB 610 Water Supply Assessment or their SB 221 Water Supply Verification. For your convenience and assistance, attached to this letter are the following summaries that should be
helpful to your understanding and compliance obligations under SB 610 and SB 221; SB 610 Flowchart (prepared for ACWA); SB 221 Flowchart (prepared for ACWA); and pages 8, 9, and 49 from the Guidebook for Implementation of SB 610 and SB 221 (prepared by the Department of Water Resources) explaining the situation where no current Urban Water Management Plan exists. It is critical that any requests for information or assistance to IID in connection with either SB 610 or SB 221 compliance be formally communicated to IID by a written solicitation to the Water Department Manager. IID will work with you to properly define the scope of work, implementation schedule, and cost estimates. IID looks forward to working with you in the future to improve your procedures, quality and compliance efforts under these important water resource management statues.

Sincerely,

Tina Anderholt Shields, P.E.
Assistant Water Department Manager
Resources Planning & Management

Attachments
DWR 9/1/05 letter
SB610 Flowchart (prepared for ACWA)
SB221 Flowchart (prepared for ACWA)
DWR Guidebook for Implementation of SB 610 and SB 221 (pages 8, 9, 49)

cc: City of Brawley
City of Calexico
City of Calipatria
City of El Centro
City of Holtville
City of Imperial
City of Westmorland
Heber Public Utilities District
Southern California Water Company
Imperial County Planning & Development Services Department (J. Heuberger)
SEP 01 2005

Ms. Tina Anderholt Shields, PE  
Assistant Water Department Manager  
Resources Planning and Management Section  
Imperial Irrigation District  
333 E. Barioni Boulevard  
Imperial, California 92251

Dear Ms. Shields:

This is in response to your e-mail dated July 7, 2005 regarding the Urban Water Management Plan filing status of the Imperial Irrigation District. Please accept my apology for the delayed response to the question contained in your email.

The listing for the Imperial Irrigation District (IID) contained on the Department of Water Resources’ Office of Water Use Efficiency and Transfers web site is not accurate and will be corrected in future reports. Thank you for bringing it to our attention.

Section 10617 of the California Water Code states, "Urban water supplier" is a supplier, either publicly or privately owned, providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually. An urban water supplier includes a supplier or contractor for water, regardless of the basis of right, which distributes or sells for ultimate resale to customers. This part applies only to water supplied from public water systems subject to Chapter 4 (commencing with Section 116275) of Part 12 of Division 104 of the Health and Safety Code.” If IID does not distribute treated water to the cities it serves, then it is not required to file an Urban Water Management Plan. This letter is to affirm the statement made in the e-mail I sent you dated August 15, 2005.

If you have further questions or require additional information, you may contact me at (916) 651-7027.

Sincerely,

[Signature]

Dave Todd  
Land and Water Use Program Manager
1.2.15 SB 610 Flowchart


→ Can city or county identify public water systems? Water Code § 10910(a)

→ Yes. Public water system determines if project’s water demand included in latest UWMP. Water Code § 10910(c)(1)

→ If included: Incorporate the information in WSA. Water Code § 10910(c)(2)

→ No. City or county water department prepares water assessment after consultation with any domestic water supplier whose service includes or is adjacent to the project. Water Code § 10910(b)

→ If not included or no UWMP: Public water system (or city or county water department if no public water system identified) must discuss in WSA if water supplies will meet project’s water demand, in addition to existing and planned future uses. Water Code § 10910(c)(3), (4)

→ Submit WSA to City or County in 90 days from date request for WSA received. May request 30 day extension if necessary. Water Code § 10910(g)(1), (2)

Does WSA show that water supply is sufficient? Water Code § 10911(a)

→ No. Public water system must provide to the City or County its plans to obtain additional water supplies, detailing the measures being used to acquire and develop those water supplies. If a City or County is preparing the WSA then its plans for acquiring additional water must be included in the WSA. Water Code § 10911(a)

→ Yes.

Include WSA in any environmental document prepared for the project pursuant to CEQA. The city or county shall determine if water supply is sufficient. If the city or county determines that the water supply is insufficient, the city or county will include that determination in its findings for the project. Water Code § 10911(b), (c)
1.3.15  SB 221 Flowchart

(a) Project is residential subdivision of 500 or more dwelling units or; (b) public water system has fewer than 5,000 connections and residential development will increase number of connections by more than 10 percent. SB 221 Sec. 4; Government Code § 66473.7(a)(1)

→ Tentative map, parcel map, development agreement application submitted. Within 5 days after application determined complete, send to public water system. SB 221 Sec. 3; Government Code § 66455.3

→ Is project in Urbanized area? SB 221 Sec. 4; Government Code § 66473.7(b)(1)

→ Yes. SB 221 does not apply.

→ No. Is project for low income housing?

→ Yes. SB 221 does not apply.

→ No, SB 221 applies.

Local agency requires WV as a condition in the tentative tract map. Government Code § 66473.7(b)(1)

→ Local agency determines if it or the applicant requests the WV from public water system. Government Code § 66473.7(b)(1)

→ Public water agency (city or county where water supplier has fewer than 3,000 services) must provide the WV within 90 days. If it fails to do so, seek writ of mandate to compel. Government Code § 66473.7(b)(1),(2)

→ If public water agency makes finding of insufficient water supply, local agency may override the finding with substantial evidence that additional supplies will be available. Government Code § 66473.7(b)(3)

→ Public water agency finds water supply is sufficient.

→ If positive WV provided or city or county overrides a negative WV, tentative map condition to verify a sufficient water supply is satisfied and final map may be recorded, assuming other conditions are also satisfied.
Section 4 - Code citations

Is there a current Urban Water Management Plan?

Water Code section 10910

(c) (1) The city or county, at the time it makes the determination required under Section 21080.1 of the Public Resources Code, shall request each public water system identified pursuant to subdivision (b) to determine whether the projected water demand associated with a proposed project was included as part of the most recently adopted urban water management plan adopted pursuant to Part 2.6 (commencing with Section 10610).

(2) If the projected water demand associated with the proposed project was accounted for in the most recently adopted urban water management plan, the public water system may incorporate the requested information from the urban water management plan in preparing the elements of the assessment required to comply with subdivisions (d), (e), (f), and (g).

(3) If the projected water demand associated with the proposed project was not accounted for in the most recently adopted urban water management plan, or the public water system has no urban water management plan, the water assessment for the project shall include a discussion with regard to whether the public water system's total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system's existing and planned future uses, including agricultural and manufacturing uses.

(4) If the city or county is required to comply with this part pursuant to subdivision (b), the water assessment for the project shall include a discussion with regard to whether the total projected water supplies, determined to be available by the city or county for the project during normal, single dry, and multiple dry water years during a 20-year projection, will meet the projected water demand associated with the proposed project, in addition to existing and planned future uses, including agricultural and manufacturing uses.
Section 4  Is there a current Urban Water Management Plan?

4-1  Is there an adopted urban water management plan (UWMP)  
Water Code § 10910(c)  
Yes  
No  
Read following note and go to Section 5, page 10

If no, assessment must be prepared based on available information. Water Code § 10910(c)(3)

If the water supplier will prepare the SB 610 assessment (Water Code § 10910(c)(3), without the benefit of a UWMP, the assessment shall include a determination as to whether the water supplier’s total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system’s existing and planned future uses, including agricultural and manufacturing uses.

If the lead agency will prepare the SB 610 assessment (Water Code § 10910(c)(4), the assessment shall include a discussion as to whether the total projected water supplies, determined to be available during normal, single dry, and multiple dry water years during a 20-year projection, will meet the projected water demand associated with the proposed project, in addition to existing and planned future uses, including agricultural and manufacturing uses.

If yes, continue

4-2  Is the projected water demand for the project accounted for in the most recent UWMP?  
Water Code § 10910(c)(2)  
Yes  
No  

If yes, information from the UWMP related to the projected water demand for the project may also be used for carrying out Section 5, Steps 1 and 2, and Section 7, as outlined in this guidance manual.  
Go to Section 5, page 10

If no, assessment must be prepared based on either information contained within the UWMP and/or information available from other sources and reports. Water Code § 10910(c)(3)  
Go to Section 5, page 10
Section 13  What information should be included in a verification?

This section is written "as if" the water supplier is preparing the verification. If an agency is preparing the verification, the same approach is used but the water supplies are those identified by the Agency as available to meet the subdivision's water demands. (Examples will be provided of how Agency verification will differ from water supplier verification.)

Verification must demonstrate supply sufficiency by showing that water supplies available during normal, single dry, and multiple dry years within a 20-year projection will meet the projected demand associated with the proposed subdivision, in addition to existing and planned future uses, including, but not limited to, agriculture and industrial uses. All of the following must be considered:

- Historical records for at least 20 years;
- Urban Water Shortage Contingency Analysis prepared for Urban Water Management Plan,
- Supply reduction for "specific water use sector" per water supplier's resolution, ordinance, or contract, and
- Amount of water expected from specified supply projects. (Government Code § 66473.7(a)(2)(A-D).)

Verification must be based upon "substantial evidence," possibly including relevant portions of an Urban Water Management Plan or SB 610 assessment. Government Code § 66473.7(c)

The Urban Water Management Planning Act (Water Code § 10631 — see Appendix C) requires the supplier to document water supplies available during normal, single dry, and multiple dry years during a 20-year projection and the existing and projected future water demand during a 20-year projection. The Act requires that the projected supplies and demands be presented in five-year increments for the 20-year projection.

If the water demand for the proposed subdivision was accounted for in the most recently adopted urban water management plan; the water supplier may incorporate information from the UWMP into the verification. (Government Code § 66473.3)

If the water demand for the proposed subdivision was accounted for in a SB 610 assessment, the water supplier may incorporate information from the UWMP into the verification. (Government Code § 66473.3)

The next section contains sample tables and data to demonstrate one method to present the required data.

Supplies from all sources including wholesaler's supplies, require documentation. This documentation includes identifying: water rights and/or contracts to the supply, associated capital outlay programs; federal, state and local permits for constructing infrastructure for conveying the supply, and; any necessary regulatory approvals required for conveyance.

Provisions for documenting groundwater are discussed below.

Continue, go to Section 13, Step 1, page 50