

Aggregated Farm Gate Delivery Reports (AFGDRs) Frequently Asked Questions

1. Q: How does DWR ensure all required reporters are submitting their AFGDRs?

Only agricultural water suppliers that either deliver 2,000 acre-feet of surface water per year for agricultural purposes or that serve 2,000 acres or more of agricultural land are required to submit an AFGDR. Therefore, agricultural water suppliers who must submit an annual AFGDR varies from year to year because the amount of water delivered (or acres served) in the preceding year can vary because of many factors such as water availability, water year type, regulations, economic factors, agronomic practices, or others. As such, DWR has no reliable means to identify who must report in any given year and it is up to each agricultural water supplier to determine if they meet the threshold for reporting in any given year and to submit their data to DWR; suppliers that may have to report one year may be under the threshold the next year.

However, to maximize compliance, DWR implements a number of processes:

- DWR maintains a robust contact list of known agricultural water suppliers in California (see FAQ 4) and sends out annual reminder notices to all on the list to encourage compliance with the reporting requirement. DWR also plans to provide annual reminders through the California Water Plan eNews publication and to our list of interested parties.
- Each agricultural water supplier is assigned to an individual DWR staff member to provide direct assistance, follow up on, and identify any AFGDR submittal errors. DWR provides technical assistance on how to submit AFGDR through PowerPoint tutorials, email correspondence, Microsoft Teams meetings, and other processes. Additionally, DWR contacts suppliers to let them know if there is missing or potentially incorrect information and allow for corrections.
- DWR also encourages agricultural water suppliers that deliver less than the reporting threshold to still submit a report indicating such or to otherwise notify DWR in order to demonstrate their compliance.

- ***Q: Where are reports submitted and how can they be accessed by the public?***

AFGDRs are submitted to and can be accessed by the public on the WUEdata Portal (<https://WUEdata.water.ca.gov/>). All AFGDR data submitted to DWR can be viewed at that location. Since 2018, electronic submittal has been required by Water Code.

The WUEdata Portal is a viable, easy-to-use system for AFGDR submissions where agricultural water suppliers can enter all of the required data in a simple electronic form to submit to DWR, and the public can then readily view and download the data. Historic paper or emailed reports received prior to 2018 were optionally entered into the portal or have been manually entered into it by DWR staff. These are kept in a separate file because of 2018 changes that now require reporting by groundwater basin.

- ***Q: Does AFGDR analyze where and by whom agricultural water in California is being used?***

No. Current statute and AFGDR regulations do not require this level of information from agricultural water suppliers. Data required by regulation and statute is very limited and it is only a report of how much water, overall, was delivered to customers; it does not include information on where/who the water was delivered to, how much that was for each customer, or how that water was used. It also does not include information on whether or not returned water was re-delivered or if other sources of water were used for agriculture in the service area, and for many suppliers, the data quality is locally-cost-effective best professional practices that are limited in terms of accuracy.

The California Water Plan, however, does provide an extensive analysis of overall statewide and regional agricultural water use using available data and models that can be found here:

<https://water.ca.gov/programs/california-water-plan>.

2. Q: Does DWR have a centralized list of all agricultural water suppliers?

DWR maintains an internal list of agricultural water suppliers in California. There is currently no legal requirement for agricultural water suppliers to identify themselves to DWR, thus DWR may not have records of *all* agricultural water suppliers or potential suppliers. DWR's list is compiled based on previous reporting history, Agricultural Water Management Plan

submittals, the 2013 California Chapter of the American Society of Farm Managers and Rural appraisers (CalASFMRA) and Ag Lenders Society of California Map of the California Water and Irrigation Districts, and online research or through other program notifications.

- This list is used internally as a reference for contact information and cannot be used to determine compliance with the AFGDR requirement because it is dynamic and up to individual agricultural water suppliers to determine if they meet the reporting criteria in any given year; the total number of agricultural water suppliers can vary based on deliveries in any particular year and as suppliers merge, disintegrate, or new suppliers are created.
- DWR currently receives about 125 reports each year, depending on which agricultural water suppliers meet the reporting criteria of supplying 2,000 acre-feet or more of irrigation water or water to 2,000 or more irrigated acres in a given year.

3. Q: How is submitted AFGDR data verified?

DWR does not have the authority to approve or confirm data or make a determination on whether or not the submittal meets the requirements of regulation. DWR's role is limited to ensuring that the report is submitted. Ultimately, it is up to water suppliers to verify the accuracy and completeness of their submitted data.

Furthermore, requirements for those suppliers delivering less than 25,000 acre-feet of water or to less than 25,000 irrigated acres, do not require measurement of deliveries with any specified degree of accuracy; suppliers can use best professional practices that are locally cost effective. This limits the ability to verify reported values as measurement or estimations may have a wide range of values. In fact, a water supplier can deliver more water than comes into their system if drainage returns to the supplier distribution system, then gets redelivered to customers.

To improve reporting and accuracy DWR has implemented the following processes:

- Developed instruction sheets for data collection will be posted to the "Resources" section of WUEdata and on the DWR Agricultural Water Use Efficiency web page. DWR staff are also available to provide technical assistance to agricultural water suppliers through emails, phone calls, or online meetings to ensure that submitted data is accurate.

- Quality assurance and quality control protocols for all AFGDR data. All AFGDR data is reviewed by designated staff members after it is submitted for erroneous numbers, missing information, and other potential errors. If errors are found, DWR staff will reach out to the supplier and request corrections or help the supplier complete the necessary information.
- ***Q: Is DWR authorized to fine non-compliant districts for not reporting?***

No. Water Code Section 531 et seq. does not give DWR authority to fine non-compliant agricultural water suppliers. However, agricultural water suppliers who are noncompliant may not be eligible for water grants or loans, depending on the individual funding program eligibility requirements. DWR requires compliance with all applicable regulations, including AFGDR, for funding eligibility.

4. Q: How can AFGDR data be used to accomplish DWR's mission and sustainably manage water for the future?

It is the mission of the California Department of Water Resources to sustainably manage the water resources of California, in cooperation with other agencies, to benefit the state's people and protect, restore, and enhance the natural and human environments. Sustainability is our priority, and we strive to meet the water needs of today and tomorrow while protecting and enhancing the environment.

- AFGDR data is limited in its utility for water management and water use efficiency analysis. This data is an overall volume of water delivered in a whole service area. Key information that are needed to assess how water is being used, if there are inefficiencies, and what could be done to better manage the long-term sustainability of this water use is not included in these reports.
- Water delivered in any given year can increase and decrease based on local climate conditions, water supplier supply availability, types of crops grown in any given year, efficiency of the irrigation system and irrigation management, whether other supplies are also used (e.g., private groundwater), and other factors.