

## 1F. Urban Water Management Compliance

The City of Imperial and City of El Centro are both Urban Water Suppliers and are in compliance with the Urban Water Management Planning Act, CWC §525, and AB 1420, as described briefly below. Heber Public Utilities District, a co-sponsor for the Intertie Project, is not designated as an urban water supplier in accordance with DWR due to having less than 3,000 connections (i.e., currently only 1,576 connections), and therefore will not be submitting related compliance documents.

Contact information for the two applicable agencies is provided below, and DWR documents that verify each of the 2010 UWMPs compliance with the requirements of the California Water Code are attached as **Exhibit 1.5**. In addition, both agencies have completed the AB 1420 and the Water Metering (CWC §525) compliance self-certification documentation, and have included hard copies with the hand-delivered wet signature package. These are also included in **Exhibit 1.6** (includes both self-cert documents).

### City of Imperial

**Agency Name:** City of Imperial

**Contact Person:** Marlene Best, City Manager

**Contact Phone Number:** (760) 355-4373

**e-mail Address:** mbest@cityofimperial.org

### City of El Centro

**Agency Name:** City of El Centro

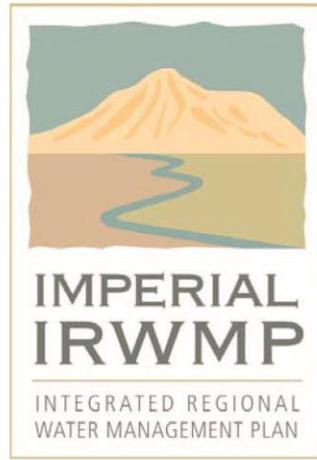
**Contact Person:** Terry Hagen, Director of Public Works

**Contact Phone Number:** (760) 337-4540

**e-mail Address:** Terry Hagen <THagen@ci.el-centro.ca.us>

### Attachment 1 Components

- 1A. Authorizing Documentation
- 1B. Eligible Applicant Documentation
- 1C. Acknowledgement Form – Submittal of Additional Information
- 1D. Adopted IRWM Plan and Proof of Formal Adoption
- 1E. Project Consistency with an adopted IRWM Plan
- ✓ **1F. Urban Water Management Compliance (this attachment)**
- 1G. Agricultural Water Management Compliance
- 1H. Surface Water Diverter Compliance
- 1I. Groundwater Management Compliance
- 1J. CASGEM Compliance
- 1K. Water Conservation Programs and Measures



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**Exhibit 1.5 – DWR Verification Documents of  
UWMP Compliance**  
City of Imperial, City of El Centro

**DEPARTMENT OF WATER RESOURCES**

1416 NINTH STREET, P.O. BOX 942836  
SACRAMENTO, CA 94236-0001  
(916) 653-5791



July 8, 2014

Mr. Ruben Duran  
City Manager  
City of El Centro  
1275 West Main Street  
El Centro, California 92243

Dear Mr. Duran:

The Department of Water Resources (DWR) has reviewed the City of El Centro's (City) 2010 Urban Water Management Plan (UWMP) received August 8, 2011. The California Water Code (CWC) directs DWR to report to the legislature once every five years on the status of submitted plans. In meeting this legislative reporting requirement, DWR reviews all submitted plans.

DWR's review of City of El Centro's 2010 Plan has found that the Plan has generally addressed the overall requirements of the CWC. DWR recommends that when updating this Plan in 2015, the City:

Address each Demand Management Measure (DMM) listed in the Water Code by providing a description of the program currently being implemented, or, for any DMM not being implemented, provide either a cost/benefit analysis, or a plan of implementation. The description of DMM (B) residential plumbing retrofit, DMM (E) large landscape programs and incentives, and DMM (N) residential toilet replacement program, did not properly address this requirement. (CWC Section 10631 (f) (g) and (h)).

By including this data in future UWMPs, the City will better meet the requirements of the Water Code.

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 UWMP data, projections, or water management strategies. This letter is meant to acknowledge that the City's 2010 UWMP has addressed these requirements. The results of the review will also be provided to DWR's Financial Assistance Branch.

Mr. Ruben Duran  
July 8, 2014  
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If you have any questions regarding the review of the plan or urban water management planning, please do not hesitate to contact me.

Sincerely,



Peter Brostrom  
UWMP Program Manager  
brostrom@water.ca.gov  
(916) 651-7034

cc: Mr. Hector Munoz  
Chief Operator  
City of El Centro

Sergio Fierro  
DWR Southern Regional Office

Marty Berbach  
DWR Headquarters

Gwen Huff  
DWR Headquarters

**DEPARTMENT OF WATER RESOURCES**

1416 NINTH STREET, P.O. BOX 942836  
SACRAMENTO, CA 94236-0001  
(916) 653-5791



June 17, 2013

Ms. Jackie Loper  
Public Works Director  
City of Imperial  
420 South Imperial Avenue  
Imperial, California 92251

Dear Ms. Loper:

The Department of Water Resources (DWR) has reviewed the City of Imperial's Self-Certification Statement – Tables 1 and 2 submitted on March 28, 2013, regarding implementation of the Urban Best Management Practices (BMPs).

The purpose of DWR's review is to determine the City of Imperial's eligibility to receive water management grant or loan funds. DWR has followed the *AB 1420 Compliance Requirements* dated January 1, 2009. For detailed information, please visit <http://www.water.ca.gov/wateruseefficiency/finance/>.

Based on DWR's review of the information in Tables 1 and 2, the City of Imperial has and is currently implementing the BMPs consistent with AB 1420 and, therefore, is eligible to receive water management grant or loan funds.

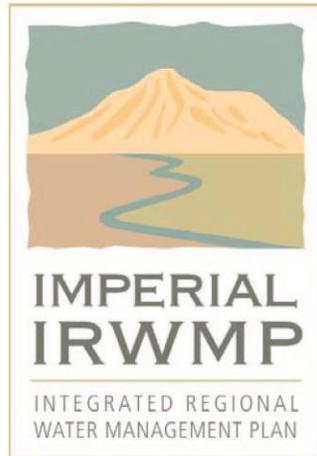
DWR reserves the right to request additional information and documentation, including reports from the City of Imperial to substantiate the accuracy of the information provided in Tables 1 and 2. DWR may reverse or modify its eligibility determination and notify you and the funding agency if inaccuracies are found in the supporting documentation or in Tables 1 and 2.

If you have any questions, please contact me at (916) 651-7034 or Betsy Vail at (916) 651-9667.

Sincerely,

A handwritten signature in blue ink, appearing to read "Peter Brostrom".

Peter Brostrom  
Urban Water Unit  
Water Use and Efficiency Branch



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## **Exhibit 1.6 – Metering Self-Certification Documents**

California State Water Resources Control Board  
California Department of Water Resources  
California Department of Public Health



**CERTIFICATION FOR  
COMPLIANCE WITH WATER METERING REQUIREMENTS  
FOR FUNDING APPLICATIONS**

In 2004, Assembly Bill 2572 added section 529.5 to the Water Code, providing that, commencing January 1, 2010, urban water suppliers must meet certain volumetric pricing and water metering requirements in order to apply for permits for new or expanded water supply, or state financial assistance for the following types of projects:

1. wastewater treatment projects
2. water use efficiency projects (including water recycling projects)
3. drinking water treatment projects

For the purposes of compliance with Section 529.5, a "water use efficiency project" means an action or series of actions that ensure or enhance the efficient use of water or result in the conservation of water supplies.

**Please consult with your legal counsel and review sections 525 through 529.7 of the Water Code before completing this certification.**

Applicants Affected

This requirement applies to urban water suppliers.

*"Urban water supplier" means 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.*

When Certification is Required

State Water Resources Control Board (SWRCB): The application for financial assistance must include a completed and signed certification form demonstrating compliance with the water metering requirements.

Department of Water Resources (DWR) funding applications: This certification must be completed and submitted with the funding application. Check the specific proposal solicitation package for directions on applicability and submittal instructions.

Department of Public Health (DPH) Safe Drinking Water State Revolving Fund Program: This certification must be completed and submitted with the executed Notice of Acceptance of Application (NOAA).

California State Water Resources Control Board  
California Department of Water Resources  
California Department of Public Health



**CERTIFICATION FOR  
COMPLIANCE WITH WATER METERING REQUIREMENTS  
FOR FUNDING APPLICATIONS**

Funding Agency name: California Department of Water Resources

Funding Program name: CDWR 2014 IRWM Drought Grant, Funded by Proposition 84

Applicant (Agency name): City of El Centro

Project Title (as shown on application form): Intertie Project between the City of

El Centro, City of Imperial, and Heber Public Utility District

Please check one of the boxes below and sign and date this form.

As the authorized representative for the applicant agency, I certify under penalty of perjury under the laws of the State of California, that the agency is not an urban water supplier, as that term is understood pursuant to the provisions of section 529.5 of the Water Code.

As the authorized representative for the applicant agency, I certify under penalty of perjury under the laws of the State of California, that the applicant agency has fully complied with the provisions of Division 1, Chapter 8, Article 3.5 of the California Water Code (sections 525 through 529.7 inclusive) and that ordinances, rules, or regulations have been duly adopted and are in effect as of this date.

I understand that the Funding Agency will rely on this signed certification in order to approve funding and that false and/or inaccurate representations in this Certification Statement may result in loss of all funds awarded to the applicant for its project. Additionally, for the aforementioned reasons, the Funding Agency may withhold disbursement of project funds, and/or pursue any other applicable legal remedy.

Terry Hagen  
Name of Authorized Representative  
(Please print)

  
Signature

Director of Public Works

Title

7-15-14

Date

California State Water Resources Control Board  
California Department of Water Resources  
California Department of Public Health



**CERTIFICATION FOR  
COMPLIANCE WITH WATER METERING REQUIREMENTS  
FOR FUNDING APPLICATIONS**

In 2004, Assembly Bill 2572 added section 529.5 to the Water Code, providing that, commencing January 1, 2010, urban water suppliers must meet certain volumetric pricing and water metering requirements in order to apply for permits for new or expanded water supply, or state financial assistance for the following types of projects:

1. wastewater treatment projects
2. water use efficiency projects (including water recycling projects)
3. drinking water treatment projects

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**Please consult with your legal counsel and review sections 525 through 529.7 of the Water Code before completing this certification.**

Applicants Affected

This requirement applies to urban water suppliers.

*"Urban water supplier" means 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.*

When Certification is Required

State Water Resources Control Board (SWRCB): The application for financial assistance must include a completed and signed certification form demonstrating compliance with the water metering requirements.

Department of Water Resources (DWR) funding applications: This certification must be completed and submitted with the funding application. Check the specific proposal solicitation package for directions on applicability and submittal instructions.

Department of Public Health (DPH) Safe Drinking Water State Revolving Fund Program: This certification must be completed and submitted with the executed Notice of Acceptance of Application (NOAA).

California State Water Resources Control Board  
California Department of Water Resources  
California Department of Public Health



**CERTIFICATION FOR  
COMPLIANCE WITH WATER METERING REQUIREMENTS  
FOR FUNDING APPLICATIONS**

Funding Agency name: CALIFORNIA DEPARTMENT OF WATER RESOURCES

Funding Program name: 2014 IRWM DROUGHT SOLICITATION

Applicant (Agency name): CITY OF IMPERIAL

Project Title (as shown on application form): INTERTIE PROJECT BETWEEN THE  
CITY OF IMPERIAL, CITY OF EL CENTRO AND HEBER PUBLIC UTILITIES DISTRICT

Please check one of the boxes below and sign and date this form.

As the authorized representative for the applicant agency, I certify under penalty of perjury under the laws of the State of California, that the agency is not an urban water supplier, as that term is understood pursuant to the provisions of section 529.5 of the Water Code.

As the authorized representative for the applicant agency, I certify under penalty of perjury under the laws of the State of California, that the applicant agency has fully complied with the provisions of Division 1, Chapter 8, Article 3.5 of the California Water Code (sections 525 through 529.7 inclusive) and that ordinances, rules, or regulations have been duly adopted and are in effect as of this date.

I understand that the Funding Agency will rely on this signed certification in order to approve funding and that false and/or inaccurate representations in this Certification Statement may result in loss of all funds awarded to the applicant for its project. Additionally, for the aforementioned reasons, the Funding Agency may withhold disbursement of project funds, and/or pursue any other applicable legal remedy.

MARLENE D. BEST

Name of Authorized Representative  
(Please print)

*Marlene D. Best*

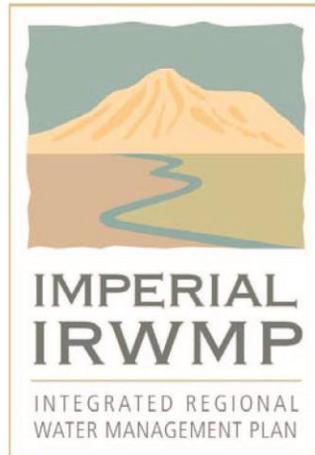
Signature

CITY MANAGER

Title

07/10/2014

Date



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## **Exhibit 1.6 –AB1420 Self-Certification Documents**



BMPs required for Wholesale Supplier	BMPs required for Retail Supplier	BMPs	BMP Implemented by Retailers and/or Wholesalers / BMP			Compliance Options/Alternative Conservation Approaches (1)			BMP Is Exempt (2)			BMP Implementation Requirements Met					
			Retailer Yes/No	Wholesaler Yes/No	Regional Yes/No	BMP Checklist	Flex Track	Gallons Per Capita Per Day GPCD	Not Cost Effective	Lack of Funding	Lack of Legal Authority	CUWCC MOU Requirement Met: Retailer Yes/No	CUWCC MOU Requirement Met: Wholesaler Yes/No	Date of BMP Report Submitted to CUWCC for (2007-2008) (MOU Signatories)	Date BMP Implementation Data Submitted to DWR in CUWCC Format (Non MOU Signatories) (3)	All Supporting Documents have been Submitted Yes/No	
✓	✓	BMP 5 Large Landscape Conservation Programs and Incentives	YES			YES					YES					7/25/2011	YES
		BMP 6 High-Efficiency Washing Machine Rebate Programs	NO			YES		X			YES					7/25/2011	YES
✓	✓	BMP 7 Public Information	YES			YES					NO					7/25/2011	YES
✓	✓	BMP 8 School Education	YES			YES					NO					7/25/2011	YES
		BMP 9 Conservation programs for Commercial, Industrial, and Institutional (CII) Accounts	YES			YES					YES					7/25/2011	YES
✓		BMP 10 Wholesale Agency Assistance Programs	YES	YES		YES					YES					7/25/2011	YES
		BMP 11 Conservation Pricing	YES			YES					YES					7/25/2011	YES
✓		BMP 12 Conservation Coordinator	YES			YES					YES					7/25/2011	YES
	✓	BMP 13 Water Waste Prohibitions	YES			YES					YES					7/25/2011	YES
	✓	BMP 14 Residential ULFT Replacement Programs	YES			YES					YES					7/25/2011	YES

\*C6: Wholesaler may also be a retailer (supplying water to end water users)  
 \*\*C8, \*\*C9, \*\*C10: Agencies choosing an alternative conservation approach are responsible for achieving water savings equal or greater than that which they would have achieved using only BMP list.

(1) For details, please see: <http://www.cuwcc.org/mou/exhibit-1-bmp-definitions-schedules-requirements.aspx>.  
 (2) BMP is exempt based on cost-effectiveness, lack of funding, and lack of legal authority criteria as detailed in the CUWCC MOU  
 (3) Non MOU signatories must submit to DWR reports and supporting documents in the same format as CUWCC.

**AB 1420 Self-Certification Statement Table 2**  
**Provide Schedule, Budget, and Finance Plan to Demonstrate Commitment to Implement All BMPs to Become in Compliance with BMP Implementation - Commencing Within 1st Year of Agreement for Which Applicant Receives Funds.**

**Self-Certification Statement:** The Urban Water Supplier and its authorized representative certifies, under penalty of perjury, that all information and claims, stated in this table, regarding compliance and implementation of the BMPs, including alternative conservation approaches, are true and accurate. This signed AB 1420 Self-Certification Statement Table 1 and Table 2 are the basis for granting funds by the Funding Agency. Falsification and/or inaccuracies in AB 1420 Self-Certification Statement Table 1 and Table 2, and in any supporting documents substantiating such claims may, at the discretion of the funding agency, result in loss of all State funds to the applicant. Additionally, the Funding Agency, in its sole discretion, may halt disbursement of grant or loan funds, not pay pending invoices, and/or pursue any other applicable legal remedy and refer the matter to the Attorney General's Office.

Name of Signatory: Terry Hagen Title of Signatory: Director of Public Works Signature of signatory:  Date: 7/16/14

**Application Date:** \_\_\_\_\_ **CUWCC Member?**  No  Yes

**Proposal Identification Number:** \_\_\_\_\_ **City of El Centro** is the UWM Plan Deemed Complete by DWR?  Yes/No  Yes

**Applicant Name:** \_\_\_\_\_ **Applicant's Contact Information:** Name Terry Hagen

Participants:	Retailer (Last Name)

CUWCC 2010 Flex Track BMPs	BMPs required for Wholesale Retail Supplier	BMPs required for Retail Supplier	BMP Implemented by Retailers and/or Wholesalers			Compliance Options / Alternative Conservation Approaches (1)			BMP is Exempt (2)			Implementation Scheduled to Commence within 1st Year of Agreement				Funds Requested, if Available (See AB 1420 Compliance Table 3) Yes/No				
			Retailer Yes/No	Wholesaler Yes/No	Regional Yes/No	Alternative Conservation Approaches Yes/No	BMP Checklist	Flex Track	Gallons Per Capita Per Day GRCD	Not Cost Effective	Lack of Funding	Lack of Legal Authority	Start Date (MM/TR)	Completion Level (%)	BMP Completion Date (MM/TR)		Budget (Dollars)	Funding Source & Finance Plan to Implement BMPs	Meets CUWCC Coverage Yes/No	
1.11	✓	✓	Yes			No	Yes								7/11	Ongoing	As-needed	City Funds	Yes	
1.12	✓	✓	Yes			No	Yes								7/11	Ongoing	As-needed	City Funds	Yes	
1.13	✓	✓	Yes	Yes		No	Yes								7/11	Ongoing	As-needed	City Funds	Yes	
1.20	✓	✓	Yes			No	Yes								7/11	Ongoing	As-needed	City Funds	Yes	
1.30	✓	✓	Yes			No	Yes								7/11	Ongoing	As-needed	City Funds	Yes	
2.10	✓	✓	Yes	Yes		No	Yes								7/11	Ongoing	As-needed	City Funds	No	
2.20	✓	✓	Yes	Yes		No	Yes								7/11	Ongoing	As-needed	City Funds	No	
3.11	✓	✓	Yes			No	Yes								7/11	Ongoing	As-needed	City Funds	Yes	
3.12	✓	✓	Yes			No	Yes								7/11	Ongoing	As-needed	City Funds	Yes	
3.20	✓	✓	Yes			No	Yes								7/11	Ongoing	As-needed	City Funds	Yes	

CUWCC 2010 Flex Track BMPs	BMPs required for Wholesale Supplier	BMPs required for Retail Supplier	BMPs Machine Rebate Programs BMP 8 High-Efficiency Washing BMP 14 Residential ULFT Replacement Programs	BMP Implemented by Retailers and/or Wholesalers			Compliance Options / Alternative Conservation Approaches (1)			BMP is Exempt (2)			Implementation Scheduled to Commence within 1st Year of Agreement									
				Retailer Yes/No	Wholesaler Yes/No	Regional Yes/No	Alternative Conservation Approaches Yes/No	BMP Checklist	Flex Track	Gallons Per Capita Per Day GPCD	Not Cost Effective	Lack of Funding	Lack of Legal Authority	Start Date (MM/YY)	Completion Level (%)	BMP Completion Date (MM/YY)	Budget (Dollars)	Funding Source & Finance Plan to Implement BMPs	Meets CUWCC Coverage Yes/No	Funds Requested, if Available. (See A13 1420 Compliance Table 3) Yes/No		
3.30	✓	✓		No			No	Yes				X				7/11		Ongoing	As-needed	City Funds	No	
3.40	✓	✓		Yes			No	Yes								7/11		Ongoing	As-needed	City Funds	Yes	
4.00	✓	✓		Yes			No	Yes								7/11		Ongoing	As-needed	City Funds	Yes	
5.00	✓	✓		Yes			No	Yes								7/11		Ongoing	As-needed	City Funds	Yes	

\*C6: Wholesaler may also be a retailer (supplying water to end water users)  
 \*\*C9, \*\* C10, and \*\*C11: Agencies choosing an alternative conservation approach are responsible for achieving water savings equal or greater than that which they would have achieved using only BMP list.  
 (1) For details, please see <http://www.cuwcc.org/troude/eh/eh1-1-bmp-definitions-schedules-requirements.aspx>.  
 (2) BMP is exempt based on cost-effectiveness, lack of funding, or lack of legal authority, as detailed in the CUWCC MOU.



BMPs required for Wholesaler Supplier	BMPs required for Retail Supplier	BMP Implemented by Retailers and/or Wholesalers / BMP			Compliance Options/Alternative Conservation Approaches (1)			BMP Is Exempt (2)			BMP Implementation Requirements Met							
		Wholesaler Yes/No	Regional Yes/No	BMP Checklist	Flex Track	Gallons Per Capita Per Day GPCD	Not Cost Effective	Lack of Funding	Lack of Legal Authority	CUWCC MOU Requirement Met: Retailer Yes/No	CUWCC MOU Requirement Met: Wholesaler Yes/No	Date of BMP Report Submitted to CUWCC for (2007-2008) (MOU Signatories)	Date BMP Implementation Data Submitted to DWR in CUWCC Format (Non MOU Signatories) (3)	All Supporting Documents have been Submitted Yes/No				
	✓	BMP 5 Large Landscape Conservation Programs and Incentives																
	✓	BMP 6 High-Efficiency Washing Machine Rebate Programs																
✓		BMP 7 Public Information	YES					X									7/29/2011	YES
✓		BMP 8 School Education	YES					X									7/29/2011	YES
	✓	BMP 9 Conservation programs for Commercial, Industrial, and Institutional (CII) Accounts																
✓		BMP 10 Wholesale Agency Assistance Programs																
	✓	BMP 11 Conservation Pricing	YES							X							7/29/2011	YES
✓		BMP 12 Conservation Coordinator	YES							X							7/29/2011	YES
	✓	BMP 13 Water Waste Prohibitions	YES							X							7/29/2011	YES
	✓	BMP 14 Residential ULFT Replacement Programs															7/29/2011	YES

\*C6: Wholesaler may also be a retailer (supplying water to end water users)  
 \*\*C8, \*\*C9, \*\* and C10: Agencies choosing an alternative conservation approach are responsible for achieving water savings equal or greater than that which they would have achieved using only BMP list.

(1) For details, please see: <http://www.cuwcc.org/mou/exhibit-1-bmp-definitions-schedules-requirements.aspx>

(2) BMP is exempt based on cost-effectiveness, lack of funding, and lack of legal authority criteria as detailed in the CUWCC MOU

(3) Non MOU signatories must submit to DWR reports and supporting documents in the same format as CUWCC.



Implementation Scheduled to Commence within 1st Year of Agreement												
CUWCC Track BMPs	BMPs required for Wholesale Supplier	BMPs required for Retail Supplier	BMP Implemented by Retailers and/or Wholesalers			Compliance Options / Alternative Conservation Approaches (1)			BMP is Exempt (2)		Funds Requested, if Available. (See AB 1420 Compliance Table 3) Yes/No	
			Wholesaler Yes/No	Retailer Yes/No	Regional Yes/No	Alternative Conservation Approaches Yes/No	BMP Checklist	Flex Track	Gallons Per Capita Per Day GPCD	Lack of Funding		Lack of Legal Authority
3.30	3.40	4.00	5.00									
	BMP 6 High-Efficiency Washing Machine Rebate Programs											
	BMP 14 Residential ULFT Replacement Programs											
<b>4. Commercial, Industrial, Institutional</b>												
	BMP 9 Conservation programs for Commercial, Industrial, and Institutional (CI) Accounts											
<b>5. Landscape</b>												
	BMP 5 Large Landscape Conservation Programs and Incentives											

\*C6: Wholesaler may also be a retailer (supplying water to end water users)  
 \*\*C9, \*\*C10, and \*\*C11: Agencies choosing an alternative conservation approach are responsible for achieving water savings equal or greater than that which they would have achieved using only BMP list.  
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