

## E. Urban Water Management Compliance

**Table 1-3** lists agency contact information and the status of Urban Water Management compliance for project proponents that meet the requirements of an “urban water supplier” according to the CWC. Each urban water supplier listed below has received acknowledgement from DWR that their urban water management plans (UWMPs) have been verified. Table 1-3 also indicates the status of self-certification documentation for compliance with requirements of AB 1420 and water metering requirements contained in CWC Section 525 *et seq.* Electronic copies of DWR UWMP verification letters, AB 1420, and water metering self-certifications were previously submitted to DWR with the 2014 IRWM Drought Grant Application, except as noted. A copy of DWR UWMP verification, and AB 1420 and CWC Section 525 self-certification documentation for the City of East Palo Alto is provided on the following pages.

**Table 1-3. Urban Water Suppliers Included in the Proposal**

Agency Name	Agency Contact	DWR Verification of Urban Water Management Plan	AB 1420 Self-Certification Documentation	Water Metering Compliance Self-Certification
City of East Palo Alto	Primary Contact: Kamal Fallaha (650) 853-3117 kfallaha@CityofEPA.org	DWR verification letter dated July 11, 2013 included with this 2015 IRWM Grant Application.	Self-certification form included with this Application.	Self-certification form included with this Application.
Marin Municipal Water District	Daniel Carney (415) 945-1522 dcarney@marinwater.org	DWR verification letter included with the 2014 IRWM Drought Grant Application.	Self-certification form included with the 2014 IRWM Drought Grant Application.	Self-certification form included with the 2014 IRWM Drought Grant Application.
Santa Clara Valley Water District	Emmanuel Aryee (408) 630-3074 earyee@valleywater.org	DWR verification letter included with the 2014 IRWM Drought Grant Application.	Self-certification form included with the 2014 IRWM Drought Grant Application.	Self-certification form included with the 2014 IRWM Drought Grant Application.



**CITY OF EAST PALO ALTO**  
**Department of Public Works - Engineering Division**  
1960 Tate Street, East Palo Alto, CA 94303  
Tel. No. 650.853.3189, Fax. No. 650.853.3179

July 16, 2015

Urban Water Management Compliance

The City of East Palo Alto – Department of Public Works – Engineering Division is the urban water supplier that will receive funds from the proposed grant.

As a disadvantaged community, the City is challenged to implement some of the BMPs due to lack of financial resources and staffing within the City or its residents. Specifically, the City does not have BMP 11 Conservation Pricing in place. With regard to water conservation, East Palo Alto has two important characteristics: a relatively low per capita water demand and limited outdoor irrigation. East Palo Alto already has one of the lowest per capita water consumption rates among the 27 Bay Area Water Supply and Conservation Agency (BAWSCA) municipalities; residential water use was 51.0 gallons per capita per day for Fiscal Year 2013-14 (BAWSCA, 2015, Table 7a). As a result, it makes Conservation Pricing difficult to achieve.

The 2010 Urban Water Management Plan was approved by DWR. The City will be preparing a 2015 Urban Water Management Plan in Fiscal Year 2015-16 and will look into incorporating additional BMP measures as funding allows.

The City is a member of the BAWSCA. BAWSCA and its member agencies continue to look to partner with each other and the other Bay Area water utilities, as appropriate, to develop regional water conservation efforts that extend beyond local interest to examine costs, benefits and other related issues on a system-wide level. The goal is to maximize the efficient use of water regionally by capitalizing on variations in local conditions and economies of scale.

The City currently relies on San Francisco Public Utilities Commission (SFPUC) for all its domestic water needs. Additionally, East Palo Alto has no storage reservoirs and relies completely on the potable supply from the SFPUC system. East Palo Alto currently has an allocation of 2,199 AFY from SFPUC during normal years. This allocation is subject to cut backs during drought emergencies.

In the last four years, the water system per capita water use has been between 51 gpcpd and 80 gpcpd. Because of this very low water use, one of the lowest in the SFPUC wholesale area if not the lowest, conservation will not reduce the per capita water use enough to sustain predicted future growth.

Additionally, because East Palo Alto is 100% dependent on the SFPUC system and having no water storage facilities, the City is prone to being immediately without water during an emergency with the SFPUC system. Due to these reasons, the City is financially focused on addressing the critical water supply issues in the system.

**DEPARTMENT OF WATER RESOURCES**

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



July 11, 2013

Mr. Anthony Docto  
Public Works Director  
City of East Palo Alto  
2200 University Avenue  
East Palo Alto, California 94303

Dear Mr. Docto:

The Department of Water Resources (DWR) has reviewed the City of East Palo Alto's 2010 Urban Water Management Plan (UWMP) received on April 30, 2013. 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 the City of East Palo Alto's 2010 plan has found that the plan has addressed the requirements of the CWC. 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 simply meant to acknowledge that the City of East Palo Alto's 2010 UWMP has addressed these requirements. The results of the review will also be provided to DWR's Financial Assistance Branch.

If you have any questions regarding the review of the plan or urban water management planning please don't hesitate to email or call.

Sincerely,

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

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

cc: Gwen Huff  
DWR Water Use & Efficiency Branch

**AB 1420 Self- Certification Statement Table 1**

**Note: Table 1 documents Status of Past and Current BMP implementation.**

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 Kamal Fallaha Title of Signatory Interim Public Works Director/City Engineer Signature of signatory *Kamal Fallaha* Date 7-16-15

**Application Date:**

Proposal Identification Number:  CUWCC Member? Yes/No   
 Has Urban Water Supplier submitted a 2005 Urban Water Management Plan? Yes/No  Is the UWM Plan Deemed Complete by DWR? Yes/No

Applicant Name: City of East Palo Alto

**Project Title:**

Applicant's Contact Information: Name: Vivian Ma, Associate Civil Engineer Phone: 650-853-3126 E-mail: vma@cityofepa.org

**Participants:**

Retailer (List Below)	Wholesaler (List Below)
City of East Palo Alto	None

C1	C2	C3	C4	C5	*C6	C7	**C8	**C9	**C10	C11	C12	C13	C14	C15	C16	C17	C18
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 1 Water Survey for Single/Multi-Family Residential Customers															
	✓	BMP 2 Residential Plumbing Retrofit															
✓	✓	BMP 3 System Water Audits, Leak Detection	Yes						x				Yes			7/18/2011	Yes
✓	✓	BMP 3 Leak Repairs	Yes						x				Yes			7/18/2011	Yes
	✓	BMP 4 Metering with Commodity Rates for All New connections	Yes						x				Yes			7/18/2011	Yes
	✓	BMP 4 Retrofit of Existing Connections	Yes						x				Yes			7/18/2011	Yes

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															
	✓	BMP 6 High-Efficiency Washing Machine Rebate Programs															
✓	✓	BMP 7 Public Information	Yes									Yes			7/18/2011	Yes	
✓	✓	BMP 8 School Education	Yes									Yes			7/18/2011	Yes	
	✓	BMP 9 Conservation programs for Commercial, Industrial, and Institutional (CII) Accounts															
✓		BMP 10 Wholesale Agency Assistance Programs															
	✓	BMP 11 Conservation Pricing	No										x			7/18/2011	Yes
✓	✓	BMP 12 Conservation Coordinator	Yes									Yes			7/18/2011	Yes	
	✓	BMP 13 Water Waste Prohibitions	Yes									Yes			7/18/2011	Yes	
	✓	BMP 14 Residential ULFT Replacement Programs															

\*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.

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: Department of Water Resources

Funding Program name: IRWM Proposition 84 - 2015 Implementation Grant Application

Applicant (Agency name): City of East Palo Alto

Project Title (as shown on application form): East Palo Alto Groundwater Supply

Conjunctive Use Project

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.

Kamal Fallaha, P.E.  
Name of Authorized Representative  
(Please print)  
Interim Public Works Director/City Engineer

Kamal Fallaha  
Signature

9/19/2015

Title

Date