

San Diego Integrated Regional Water Management 2019 IRWM Implementation Grant Proposal Authorization and Eligibility Requirements – Authorizing Documentation

Attachment 1 consists of the following items:

- ✓ **Authorization and Eligibility Requirements.** This attachment explains how the applicant, projects, and project proponents included within this Proposal meet the authorizing documentation and eligible applicant requirements set by the California Department of Water Resources (DWR) in the *Proposal Solicitation Package for the 2019 Implementation Grant Solicitation (2019 PSP)*. The attachment is comprised of nine separate files, each of which correspond to the applicable authorization and eligibility requirements described in the *2019 PSP*:
 - 1-1. Authorizing Documentation
 - 1-2. Eligible Applicant Documentation
 - 1-3. Submittal of an Updated IRWM Plan
 - 1-4. Urban Water Management Compliance, including:
 - 2015 Urban Water Management Plan (UWMP) Verification letters from DWR (as applicable)
 - AB 1420 Self-certification Form (as applicable)
 - Water Metering Self-Certification Form (as applicable)
 - 1-5. Agricultural Water Management Compliance and Measurement Compliance
 - 1-6. Surface Water Diverter Compliance (as applicable)
 - 1-7. Groundwater Management Compliance (as applicable)
 - 1-8. CASGEM Compliance, including:
 - CASGEM Confirmation letters from DWR (as applicable)
 - GIS shapefile showing service area boundaries of project sponsors that are eligible monitoring entities per CWC §10927
 - 1-9. Stormwater Management Plan Compliance (as applicable)

Authorizing Documentation

Resolution 2019-17 was adopted by the San Diego County Water Authority (SDCWA) Board of Directors on September 26, 2019, and authorizes SDCWA to submit this *2019 IRWM Implementation Grant Proposal* and execute an agreement with the State of California for implementation of seven priority water resources projects and grant administration (see **Appendix 1-1**).

Eligible Applicant Documentation

This 2019 IRWM Implementation Grant Proposal is being submitted by San Diego County Water Authority (SDCWA). Per the adopted Memorandum of Understanding Between City of San Diego, County of San Diego, and San Diego County Water Authority for the Integrated Regional Water Management Program for Fiscal Years 2012-2016, (amended January 2019 to extend to December 31, 2020), the San Diego Regional Water Management Group (RWMG) – comprising the City of San Diego, the County of San Diego, and SDCWA – has determined that SDCWA shall have overall responsibility for submitting all applications to the State on behalf of the parties (see **Appendix 1-2**). SDCWA is submitting this grant proposal on behalf of the following entities:

- Project 1: City of National City
- Project 2: City of San Diego
- Project 3: SDCWA
- Project 4: Fallbrook Public Utility Department (FPUD)
- Project 5: City of Oceanside
- Project 6: San Elijo Joint Powers Authority (San Elijo JPA)
- Project 7: San Elijo JPA

The application will also include a Grant Administration project (to be implemented by SDCWA) for the purposes of administering the Proposition 1, Round 1 grant and coordinating with the entities listed above. SDCWA has submitted for and been awarded several IRWM Grant agreements after January 1, 2012, including:

- Prop 84-Round 2 in March 2013 – Grant Agreement No. 4600011516
- Prop 84-Drought Round (Round 3) in July 2014– Grant Agreement No. 4600010901
- Prop 84-Round 4 in August 2015 – Grant Agreement No. 4600010589
- Prop 1-Round 1 Disadvantaged Community Involvement Grant in November 2016– Grant Agreement No. 4600011848

In accordance with the 2019 PSP, SDCWA (as the grant applicant) is not required to submit the eligible applicant information listed on page 21 of the 2019 PSP because it has applied for and been awarded IRWM grants after January 1, 2012.

Adopted IRWM Plan and Proof of Formal Adoption

In 2019, the San Diego RWMG – together with its Regional Advisory Committee (RAC) – updated its 2013 IRWM Plan consistent with the *2016 IRWM Grant Program Guidelines (2016 Guidelines)*¹ and CWC §10543. The *2019 San Diego Integrated Regional Water Management Plan (2019 IRWM Plan)* was finalized in May 2019, and formally adopted by RWMG agencies' governing bodies and all project proponents on the dates provided below. Copies of adoption resolutions are included in **Appendix 1-3**.

- RWMG:
 - SDCWA (Project Applicant): July 25, 2019
 - County of San Diego: September 25, 2019
 - City of San Diego: October 23, 2019
- Project 1: City of National City: February 18, 2020 or March 3, 2020
- Project 2: City of San Diego (see above)
- Project 3: SDCWA (see above)
- Project 4: FPUD: December 9, 2019
- Project 5: City of Oceanside: December 18, 2019 (on agenda)
- Projects 6 & 7: San Elijo JPA: December 9, 2019

SDCWA, on behalf of the RWMG and San Diego IRWM Region, submitted the *2019 IRWM Plan* to DWR for review in accordance with Chapter 4: Plan Review Process of the *2016 Guidelines Volume 2*. The Plan Review Process is designed to assess whether an IRWM Plan is consistent with the IRWM Plan Standards included in the *2016 Guidelines*. DWR sent a letter dated October 4, 2019 to SDCWA stating the Draft Review of the *2019 IRWM Plan* found the Plan to be consistent with the IRWM Planning Act and related IRWM Plan Standards contained in the *2016 Guidelines*. A copy of this letter is included in **Appendix 1-4**. The Public Comment period on DWR's Plan Review closed on December 7, 2019. Per communication with DWR on December 12, 2019, no comments on the Draft Review were received, and a final review letter formally approving the plan had been prepared. A copy of the final confirmation letter from DWR will be provided upon receipt from DWR.

¹ Department of Water Resources (DWR). 2016. *Integrated Regional Water Management Grant Program Guidelines*. July.

Urban Water Management Compliance

All urban water suppliers included as project proponents in this *2019 IRWM Implementation Grant Proposal* are compliant with the urban water management, water loss, and water meter requirements listed in the *2019 PSP*. **Table 1-1** indicates required information and supporting documents included in **Appendix 1-5, 1-6, and 1-7** per the *2019 PSP*.

Urban Water Management Plan Compliance

There are four urban water suppliers included as project proponents within this *2019 IRWM Implementation Grant Proposal*: City of San Diego, SDCWA, City of Oceanside, and FPUD. As required by the Urban Water Management Planning Act (CWC §10610 *et seq.*), each of these agencies submitted complete 2015 Urban Water Management Plans (UWMP). All four of these agencies have received approval by DWR regarding their 2015 UWMPs and are currently eligible to receive grant funds. UWMP compliance documents have been provided for these agencies in **Appendix 1-5**.

Water Loss Audit Report (SB 555 Compliance)

In accordance with Senate Bill 555, urban water suppliers are required to have submitted a complete and validated water loss audit report to DWR. Of the six applicant agencies, the four urban water suppliers are required to comply. Verification from DWR that the City of San Diego, SDCWA, City of Oceanside, and FPUD submitted a complete and validated water loss audit report is included in **Appendix 1-6**.

Water Meter Compliance

As defined in the *2016 Guidelines*, CWC §525 *et seq.* requires urban water suppliers applying for IRWM grant funds to demonstrate that they meet the State's Water Meter requirements. All four project sponsors that are urban water suppliers have submitted water meter compliance forms, confirming whether the agency is subject to compliance by checking the urban water supplier grant (see **Appendix 1-7**).

Table 1-1: UWMP Compliance Contact Information for Urban Water Suppliers

Project	Agency	Contact Name	Phone	Email	DWR Verification Date of UWMP	Water Loss Audit Report Compliance Date	Water Metering Compliance Date
1	City of National City	Roberto Yano	(619) 336-4380	ryano@nationalcityca.gov	N/A	N/A	N/A
2	City of San Diego	Carmel Wong	(858) 614-5775	cwong@saniego.gov	August 18, 2017	October 5, 2018	October 30, 2019
3	SDCWA	Joni German	(858) 522-6705	jgerman@sdcwa.org	September 6, 2016	October 5, 2018	November 18, 2019
4	FPUD	Aaron Cook	(760) 999-2713	acook@fpud.com	October 9, 2017	September 25, 2018	November 7, 2019
5	City of Oceanside	Cari Dale	(760) 435-5827	cdale@oceansideca.org	March 28, 2018	October 4, 2018	December 9, 2019
6, 7	San Elijo JPA	Michael T. Thornton	(760) 753-6203	thornton@sejpa.org	N/A	N/A	N/A

Agricultural Water Management Compliance

None of the project proponents are agricultural water suppliers, and all agricultural water demands supplied by the project proponents are included in their respective UWMPs. Therefore, no Agricultural Water Management Plans required for any of the project proponents.

Surface Water Diverter Compliance

Three local project sponsors in this Proposal are surface water diverters: City of San Diego, SDCWA, and City of Oceanside. Contact information for those agencies is included in **Table 1-2**. Each of these project proponents has submitted surface water diversion reports to the State Water Resources Control Board (SWRCB) in compliance with Part 5.1 of Division 2 of the CWC. The most recent diversion reports downloaded from the SWRCB's website are included as **Appendix 1-8**. Contact information for these surface water diverters is provided here.

Table 1-2: Contact Information for Surface Water Diverters

Project	Agency	Contact Name	Phone	Email	Verification Documentation Date
2	City of San Diego	Carmel Wong	(858) 614-5775	cwong@sandiego.gov	March 29, 2019
3	SDCWA	Joni German	(858) 522-6705	jgerman@sdcwa.org	March 6, 2019
5	City of Oceanside	Cari Dale	(760) 435-5827	cdale@oceansideca.org	June 29, 2019

Groundwater Management Compliance

One of the seven projects included within this Proposal requires compliance with or development of a groundwater management plan (GWMP).

The City of National City’s project (*Paradise Valley Creek Water Quality and Community Enhancement*) involves reducing flood risks and improving water quality through creek improvements, stormwater capture, and infiltration. The project will divert stormwater to a diversion basin, where pollutants will settle out, and some flows will infiltrate into the Coastal Plain of San Diego groundwater basin. The City of National City is a member of the Sweetwater Authority JPA, which has an existing Groundwater Management Plan, therefore, the City of National City is already subject to the Sweetwater Authority’s Groundwater Management Plan. National City’s Groundwater Management Compliance form can be found in **Appendix 1-9**. Contact information for the project can be found in **Table 1-3** below.

The City of Oceanside’s project involves the construction of two injection wells for recharge of advanced treated water. This project overlies the Lower San Luis Rey Groundwater Basin (referred to locally as the Mission Basin). A groundwater basin boundary modification request submitted to DWR noted the Lower San Luis Rey Groundwater Basin is subterranean flow of the San Luis Rey river and should therefore be managed as surface water under the State’s water rights system. The Phase 2 draft of the SGMA Basin Prioritization (<https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization>) has separated the San Luis Rey Groundwater Basin (Bulletin 118 Basin 9-7) into the Upper and Lower San Luis Rey Groundwater Basins. The Upper San Luis Rey Basin is designated a medium priority basin, while the Lower San Luis Rey has been designated very low priority and determined to be subterranean flow, rather than a groundwater basin. The Groundwater Management Compliance form is therefore not applicable to projects that directly affect the Lower San Luis Rey Groundwater Basin. See **Appendix 1-9** for more information.

All other projects do not require compliance because they would not involve groundwater management or recharge.

Table 1-3: Contact Information for Groundwater Users

Project	Agency	Contact Name	Phone	Email	Project Effect on Groundwater	GWMP Compliance
1	National City	Roberto Yano	(619) 336-4380	ryano@nationalcityca.gov	Stormwater infiltration	Yes

CASGEM Compliance

Within the San Diego IRWM Region, there are two medium priority groundwater basins per the California Statewide Groundwater Elevation Monitoring (CASGEM) Program: San Pasqual Valley and Upper San Luis Rey Valley. There are no high priority groundwater basins in the Region. Two of the project sponsors in this Proposal (City of San Diego and City of Oceanside) are eligible monitoring entities as defined in CWC §10927. The remaining four project sponsors are not eligible monitoring entities because they are public agencies without jurisdiction over groundwater management, activities, or monitoring (National City, SDCWA, FPUD, and San Elijo JPA). An explanation of why each project proponents is or is not an eligible monitoring entity, as defined in CWC §10927 is provided here:

- **Project 1: National City (Ineligible):** National City is not an eligible monitoring entity because it has no jurisdiction over groundwater-related activities in the Region.
- **Project 2: City of San Diego (Eligible):** The City of San Diego is an eligible monitoring entity because it is a local agency that is managing all or part of the San Diego River Valley Basin and the San Pasqual Valley Basin, among others. It regularly reports groundwater monitoring results to the State.
- **Project 3: SDCWA (Ineligible):** SDCWA is not an eligible monitoring entity because it is a public agency without jurisdiction over groundwater management.
- **Project 4: FPUD (Ineligible):** FPUD is not an eligible monitoring entity because it is not a groundwater management agency, groundwater replenishment district, local agency monitoring and reporting groundwater levels, or part of a voluntary groundwater monitoring association.
- **Project 5: City of Oceanside (Eligible):** The City of Oceanside is an eligible monitoring entity because it manages part of the Lower San Luis Rey Groundwater Basin. The County of San Diego is the monitoring entity for the Lower San Luis Rey Groundwater Basin, which is a very low priority basin.
- **Projects 6 & 7: San Elijo JPA (Ineligible):** San Elijo JPA is a wastewater collection and treatment entity that provides recycled water for irrigation uses. It does not utilize or recharge groundwater resources.

Table 1-4 shows the groundwater basins in the Region that underlie the projects included in this Proposal.

Figure 1-1 shows the location of the identified medium-priority groundwater basins in the Region, along with the service areas of each project sponsor and the location of each project. A geographic information system (GIS) shapefile called “Eligible Monitoring Entity Service Area Boundaries” that includes the service area boundaries for the eligible monitoring agencies (City of San Diego) has been uploaded to GRanTS.

SDCWA’s and the City of San Diego’s service area overlie the medium-priority San Pasqual Valley Groundwater Basin, which is monitored by the City of San Diego under CASGEM, while SDCWA’s service area also overlies the medium-priority Upper San Luis Rey Valley Groundwater Basin. However, neither of their projects (*2020 Regional Water Use Efficiency Program* and *North City Pure Water Influent Pump Station*) directly affects these basins.

North City Pure Water Facility Influent Pump Station (City of San Diego)

The City of San Diego’s *North City Pure Water Facility Influent Pump Station* would not directly affect groundwater levels in a medium or high priority basin because the project area does not overlie the San Pasqual Valley Basin, and would not directly affect groundwater levels or quality. Additionally, because imported water is the least preferred supply, water produced by the project would first be used to offset purchases of imported water before changing the pumping in the groundwater basin.

2020 Regional Water Use Efficiency Program (SDCWA)

SDCWA’s project will be offered throughout their service area which overlies two medium priority basins: the San Pasqual Valley Groundwater Basin and the Upper San Luis Rey Valley Groundwater Basin. The project’s primary focus is water conservation, and its quantified benefits are water conservation and energy savings associated with reduced water demands. Because groundwater is less expensive than water purchased from agencies, agricultural participants that receive even some water from SDCWA or its member agencies are expected to use the conserved water to offset water purchases before offsetting groundwater demands. There is a possibility that there will be indirect benefits to groundwater basins if agricultural users that rely solely on groundwater choose to

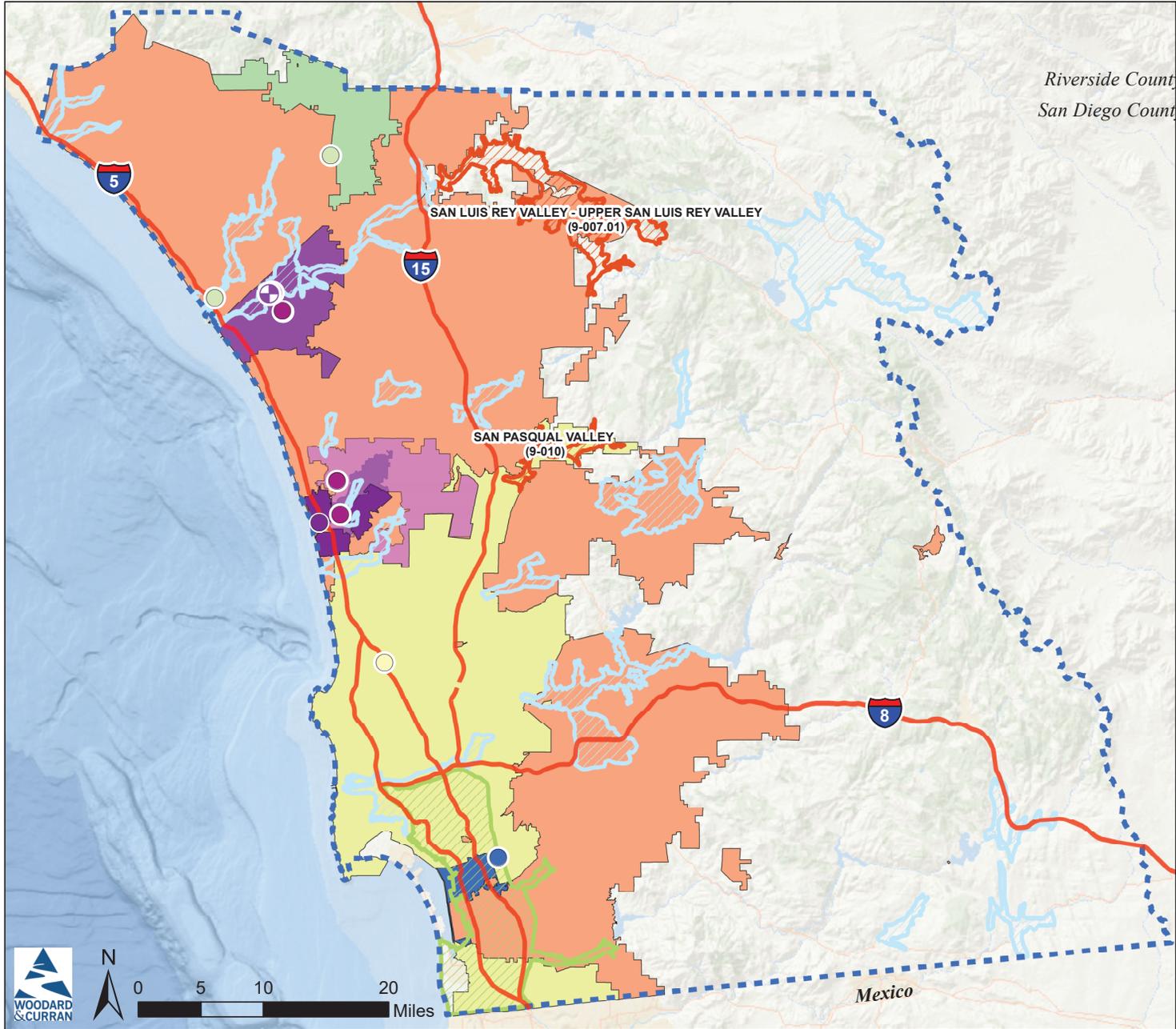
participate in the program. However, SDCWA cannot control which users will participate, nor whether those users will be located within either of the two medium priority basins. As such, this project may indirectly affect groundwater levels but would not directly affect groundwater supplies.

Table 1-4: Groundwater Basin Monitoring Priority for Projects

Projects		Project Proponent	Underlying Groundwater Basin(s)	Basin Priority (If Applicable)	Designated Monitoring Entity (If Applicable)	Eligible As a Monitoring Entity?
1	Paradise Valley Creek Water Quality and Community Enhancement	City of National City	Coastal Plain of San Diego	Low	N/A	No
2	North City Pure Water Facility Influent Pump Station	City of San Diego	Coastal Plain of San Diego	Low	N/A	No
			San Diego River Valley	Very Low	City of San Diego	No
			Mission Valley	Very Low	N/A	No
			Poway Valley	Very Low	N/A	No
			San Dieguito Creek	Very Low	N/A	No
			San Pasqual Valley	Medium	City of San Diego	No
3	2020 Regional Water Use Efficiency Programs	SDCWA	San Mateo Valley	Very Low	N/A	No
			San Onofre Valley	Very Low	N/A	No
			Santa Margarita Valley	Very Low	N/A	No
			Upper San Luis Rey Valley	Medium	None	No
			Lower San Luis Rey Valley	Very Low	None	No
			Escondido Valley	Very Low	N/A	No
			San Pasqual Valley	Medium	City of San Diego	No
			Santa Maria Valley	Very Low	N/A	No
			San Dieguito Creek	Very Low	N/A	No
			Poway Valley	Very Low	N/A	No
			Mission Valley	Very Low	N/A	No
			San Diego River Valley	Very Low	City of San Diego	No
			El Cajon Valley	Very Low	N/A	No
			Coastal Plain of San Diego	Low	N/A	No

Projects		Project Proponent	Underlying Groundwater Basin(s)	Basin Priority (If Applicable)	Designated Monitoring Entity (If Applicable)	Eligible As a Monitoring Entity?
			Batiquitos Lagoon Valley	Very Low	N/A	No
			San Elijo Valley	Very Low	N/A	No
			Pamo Valley	Very Low	N/A	No
			San Marcos Area	Very Low	N/A	No
4	Lower Santa Margarita IPR Pilot Project	Fallbrook Public Utility Department	Santa Margarita Valley	Very Low	N/A	No
5	Oceanside Pure Water	City of Oceanside	Lower San Luis Rey Valley	Very Low	N/A	No
6	North County Recycled Water Project	City of Oceanside	Lower San Luis Rey Valley	Very Low	N/A	No
			San Elijo Valley	Very Low	N/A	No
7	San Elijo Stormwater Capture & Reuse	San Elijo JPA	San Elijo Valley	Very Low	N/A	No

IRWM Proposition 1 Round 1 2019 Implementation Grant CASGEM Eligibility



Legend

- Project 1: Paradise Valley Creek Water Quality and Community Enhancement
- Project 2: North City Pure Water Facility Influent Pump Station
- Project 3: 2020 Regional Water Use Efficiency Programs
- Project 4: Lower Santa Margarita River IPR Pilot Project
- ⊕ Project 5: Pure Water Oceanside
- Project 6: North County Recycled Water Project
- Project 7: San Elijo Stormwater Capture & Reuse

— Highways

SDIRWM Region

Groundwater Basins

- Medium
- Low
- Very Low

Local Project Sponsors

Local Project Sponsors Service Areas

- City of National City
- City of San Diego
- San Diego County Water Authority
- Fallbrook Public Utility District
- City of Oceanside
- Olivenhain Municipal Water District
- San Elijo Joint Powers Authority

Stormwater Management Plan Compliance

In 2019, the San Diego RWMG updated its *2013 San Diego IRWM Plan* to be consistent with the *2016 Guidelines* (DWR 2016) and CWC §10543. The updated *2019 San Diego IRWM Plan* also incorporated the San Diego Region Storm Water Resource Plan (SWRP), which was adopted by the San Diego IRWM Region in June 2017. The SWRP is consistent with the SWRCB's *2015 Storm Water Resource Plan Guidelines*.² It compiled stormwater planning information from a variety of sources across the county, and developed criteria to assist project sponsors in identifying opportunities to provide multiple benefits. All stormwater and dry weather capture projects seeking funding through Proposition 1 are required to be included in the SWRP. The SWRP includes a "living" prioritized project list that agencies can add to and update through joint use of the San Diego IRWM program's online project database (<http://irwm.rmcwater.com/sd/login.php>). The online project database includes the following projects:

- **Project 1: National City:** The Paradise Valley Creek Water Quality and Community Enhancement Project is included in the SWRP.
- **Project 7: San Elijo JPA:** San Elijo Stormwater Capture and Reuse Project is included in the SWRP.

See **Appendix 1-10** for documentation that these projects are included in the SWRP.

² State Water Resources Control Board (SWRCB). 2015. *Storm Water Resource Plan Guidelines*. December.