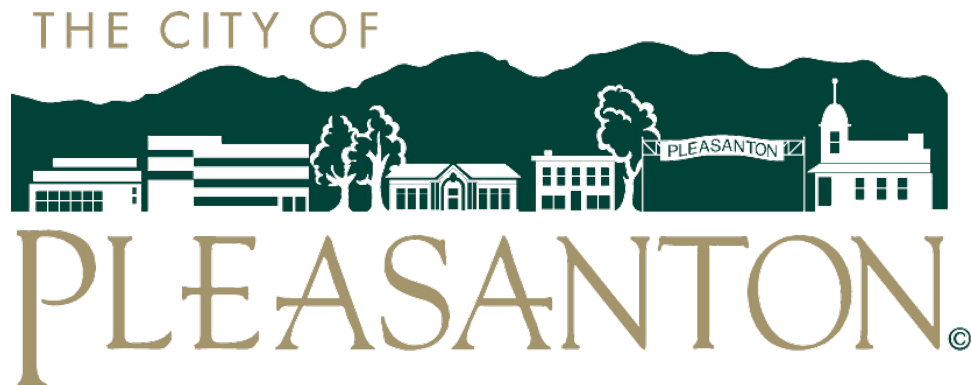


WaterSMART Grants: Small-Scale Water Efficiency Projects for Fiscal Year 2023 & 2024

Bureau of Reclamation NOFO R22AS00195



Eco-Friendly Lawn Conversion Rebate Program

April 26, 2022

City of Pleasanton
Operations Services Department
P.O. Box 520
Pleasanton, CA 94566

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Table of Contents

Technical Proposal and Evaluation Criteria	3
Executive Summary	3
Project Summary	3
Project Location	4
Project Description	5
Evaluation Criteria.....	7
E.1.1 Evaluation Criterion A – Project Benefits (35 Points).....	7
E.1.2 Evaluation Criterion B – Planning Efforts Supporting the Project (30 Points).....	10
E.1.3 Evaluation Criterion C – Implementation and Results (20 Points)	11
E 1.4 Evaluation Criterion D – Nexus to Reclamation (5 Points).....	12
E 1.5 Evaluation Criterion E - Presidential & Department of the Interior Priorities (10 Points).....	12
Overlap or Duplication of Effort Statement (D.2.2.9)	14
Project Budget.....	15
Environmental and Cultural Resources Compliance	17
Requires Permits or Approvals	19
Letter of Support and Letters of Partnership.....	19
Official Resolution	19
Conflict of Interest Disclosure.....	19

Technical Proposal and Evaluation Criteria

Executive Summary

Date: April 26, 2022

Applicant Name: City of Pleasanton, Operations Services Department

Project Manager:

Rita Di Candia
Environmental Services Manager
rdicandia@cityofpleasantonca.gov
(925) 931-5513

Applicant Category: Category A

Grant Funding Request: \$45,000

Non-Federal Matching Funds: \$45,000

Project Duration: 1 year (ongoing rebate program offered by the City of Pleasanton)

Estimated Project Start Date: July 2022

Estimated Project Completion Date: June 2024

Located on Federal Facility: No

Unique Entity identifier: ZQLCND5KBU99

Project Summary

The City of Pleasanton (City) seeks to boost its 2023 fiscal year budget to expand funding of the City's Eco-Friendly Lawn Conversion Rebate Program (EFLC Rebate), in support of continued efforts to reduce long-term potable water demands. With the increase in severe, multi-year droughts, uncertainty in the timing of water availability due to climatic changes, and limited supply options, the City has a long-standing commitment to reducing the demand of potable water. The City initially began offering water conservation assistance to City water customers in the 1990s. Reducing outdoor water use with the replacement of high water need lawns to low-water or "drought tolerant" plant species; is a well-recognized approach towards lowering long-term water demands. With the goal of improving outdoor water use efficiency, in 2012, the City of Pleasanton launched a lawn conversion rebate program to help boost the regional lawn conversion rebate program offered by its water wholesaler, Zone 7 Water Agency (Zone 7). This

program is offered to residential, commercial, and dedicated irrigation metered water customers within the City's existing water serviced area. Recently, the City's lawn conversion program has been redesigned into the EFLC Rebate to support an ecologically friendly approach towards lawn transformations. Increased funding through the award of this funding opportunity, would allow the City to potentially double the square footage of converted landscaping over the fiscal year.

Project Location

The City of Pleasanton is located approximately 30 miles southwest of Oakland, California. Situated in Alameda County in the eastern portion of the Bay Area in Northern California. The City's water service area encompasses an area of approximately 22 square miles, which includes the area within the City boundary, Pleasanton Ridge, and parts of unincorporated Alameda County just north of the town of Sunol. Figure 1 shows the City limits boundary and City's current potable water service area reach. The City's water utility serves all residents, businesses, and dedicated irrigation meters within the water service area. The City's lawn conversion rebate program is available to all City water customers with a minimum of 100 square feet of lawn within the City's water service area. All funded projects will occur within the City's water service area. The project has a latitudinal range of 37-39'57" N and a longitudinal range of 121-52'52" W. The City of Pleasanton experiences a Mediterranean climate characterized by cool, predominately dry winters with intermittent storms, followed by dry, warm late spring into hot summers.

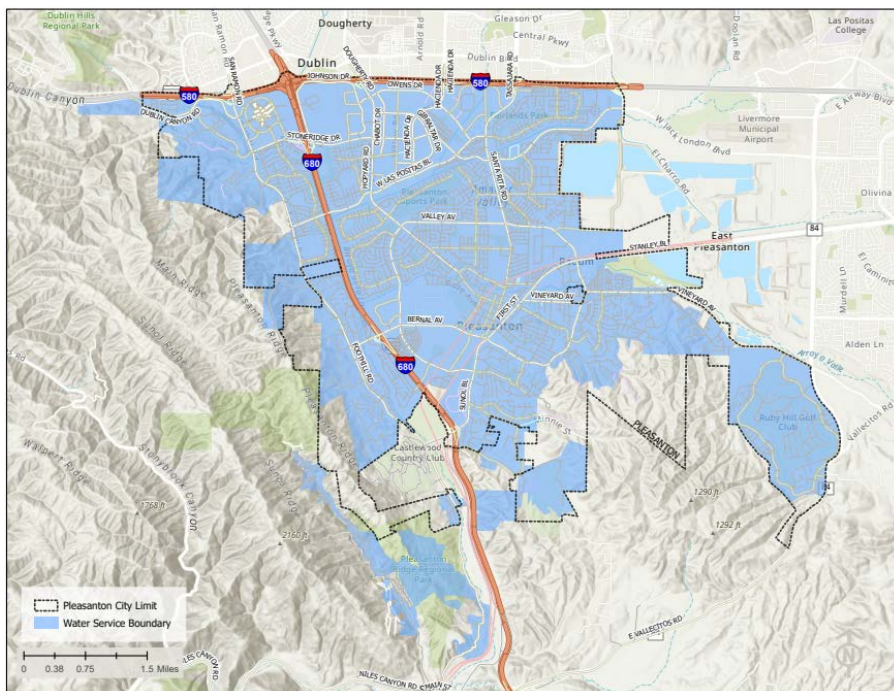


Figure 1. Current City of Pleasanton potable water service boundary.

Project Description

The City of Pleasanton requests funds in the amount of \$45,000 to support its Eco-Friendly Lawn Conversion (EFLC) Rebate Program for residential, commercial, and dedicated irrigation metered water customers.

Severe drought, climate change, and population growth continue to put pressure on current water supply reliability. While the City has a wide variety of water conservation services, lawn conversion programs are recognized as a significant long-term water conservation strategy towards building a more water adaptive community.

Effective July 1, 2022, the City's EFLC Rebate will provide \$0.50 per square foot of eligible converted lawn, up to 50% of material cost up to \$575.00 for residential and commercial water customers with mixed outdoor/indoor use water meters. Water customers with dedicated irrigation meters, can receive \$0.75 per square foot of eligible converted lawn, up to 50% material cost up to \$4,000. The lawn area (high water use) removed under the EFLC, is converted to a low to very-low water use landscapes; with approved plants selected from qualifying plant lists.

Applicants eligible for the rebate program must meet the following criteria:

- Must be a City water customer with an active water account(s) that is in good standing (account balance/payment is not delinquent status)
- Applicant must be within the City water service area.
- Existing lawn area(s) to be converted must be maintained and in healthy condition*.
*With the exception of drought periods with required outdoor watering restrictions.
- Must be converting a minimum of 100 square feet of lawn located in the front yard or visible from a public sidewalk. (Backyards lawns are not eligible under the EFLC Rebate).
- All of the following ecologically best practices must be included in the lawn conversion project:
 - Sheet mulching must be used as the conversion method.
 - Planted areas must have a 1-inch layer of compost, followed by at least a 3-inch layer of mulch.
 - Selected low to very low water plant species include multiple plants of at least two varieties of California native species.
 - Plant installation can only take place in the cooler season months between September and February.

These criteria were established to ensure that each project will effectively meet the City's target of reducing outdoor potable water demand. Eligible applicants (Applicants) are required

to fill out an EFLC application, submit an accompanying Zone 7 Lawn Conversion Rebate to Zone 7 Water Agency (the City's water wholesaler; the City's lawn conversion program was originally designed to boost the incentive provided by Zone 7's lawn conversion rebate, and has been subsequently updated to incentivize Applicants to select an environmentally friendly lawn conversion approach towards their conversion project), and provide supplemental documents to City staff, including before photos, proposed project design, and proposed plant list. All applications are thoroughly reviewed by City staff to ensure each project meets the programs requirements.

Applicants eligible for the EFLC Rebate must meet the additional converted landscape requirements:

- Projects must include a sufficient number of qualifying plants to ensure that at least fifty percent (50%) of the converted area is covered when plants are fully grown.
- All plants installed in the converted area must be classified as low or very low-water use and be listed on the City of Pleasanton (COP) Qualifying Plant, Water Use Classification of Landscape Species (WUCOLS), UC Davis Arboretum All-Stars, and/or Tri-Valley Water-Wise Plant lists.
- Any existing overhead sprinkler system in the converted area must be removed, capped in place, or converted to a low volume drip system. The converted landscape area is not required to have an irrigation system, however, any new irrigation system in the converted area must be low-volume drip, equipped with proper backflow prevention (commercial/irrigation customers), a rainfall shutoff valve, a pressure regulator, filter, and pressure-compensating emitters.
- Artificial Turf and non-permeable hardscapes are not allowed in the converted area and will not be rebated. Permeable hardscapes are allowed as long as the 50% coverage requirement is met.

Applicants agree to a pre-inspection by City staff for confirmation of the lawn conversion project (Project) submitted square footage. Once the Applicant's Project has been approved by City staff, the Applicant is issued a *City of Pleasanton Eco-Friendly Lawn Conversion Authorization*, and the applicant then has 120 days to complete the conversion project within the cool season planting timeframe (September through February). Applicants are required to document the lawn conversion project with pictures and provide the City with receipts of purchased materials and a final plant list. Once the project has been completed, a final review of the submitted pictures and receipts, and post site inspection is performed by City staff to ensure the Project meets the program requirements. Lawn conversion projects that successfully meet all the requirements will then be awarded the rebate amount determined by the above-described City EFLC Rebate terms and conditions.

Once an Applicant has exhausted the maximum rebate available to them, they are no longer eligible to receive an additional EFLC Rebate. No previously converted lawn areas can reapply for this program.

Evaluation Criteria

E.1.1 Evaluation Criterion A – Project Benefits (35 Points)

Describe the anticipated water management benefits to the City’s water supply delivery system and water customers as a result of implementing the proposed project.

Water Supply Delivery System:

Implementation of this Project will help to modestly reduce annual potable water demand within the City’s water service area. This will result in a modest reduction in the purchasing of water and energy costs to the City, since the City purchases approximately eighty percent (80%) of the annual potable water supply from Zone 7 Water Agency, and pumps approximately twenty percent (20%) from local ground water wells, which is energetically costly.

Individual Water Customer Benefits:

Water customers that participate in the conversion of water-thirsty lawns into drought tolerant landscaping, are investing in a long-term strategy to improve their outdoor watering need, as well as increasing their landscape’s resiliency to repeated droughts. Upon the initial installation of the approved plants, even drought tolerant landscapes need supplemental watering for establishment. The terms of the City’s EFLC Rebate minimize the impact of the initial planting installation watering need, by the temporal benefit of cool season planting with anticipated periodic seasonal rainfall, decreasing the need for scheduled watering by a drip system or by hand via a garden hose.

Reputable sources have found a range of water-savings per square foot of converted lawn, depending upon the local climate. A study conducted by Valley Water¹ found a savings of 31 gal/ft² of converted landscape in years two and three after conversion, and a savings of 48 gal/ft² of converted landscape in the fifth year after conversion. Analysis conducted by the nationally recognized Alliance for Water Efficiency² (AWE) found that within similar regions within California that experience similar long dry summers as Pleasanton, saw an average water savings range between 23.5 gal/ft² and 44.3 gal/ft² of converted landscape, with strong trend in increased savings in relationship to the number of years following installation, persisting with the retention of the drought tolerant landscaping. Taking the low- and the high-end average annual savings from these studies (23.5 – 48 gal/ ft²), we estimate that a residential customer

¹ Bijoor, Neeta, Valley Water; *Saving Water with a Landscape Water Conservation Rebate Program*. Journal AWWA, January/February 2021.

² Alliance for Water Efficiency, *Landscape Transformation Study: 2018 Analytics Report*. (https://www.allianceforwaterefficiency.org/sites/www.allianceforwaterefficiency.org/files/assets/LT_Analytics_Report_NonMember_Final.pdf)

converting 1,150 square feet of landscaping (to take advantage of the full rebate maximum), will save an average of 35,560 to 55,200 gallons per year between years two and five following their lawn conversion project. Other individual benefits to customers include the elimination of regular lawn mowing work, as well as the elimination of fertilizer or herbicide applications commonly applied to lawns.

The potential water savings that could collectively occur through the City's available one year of budget for the EFLC Rebate is between 1,673,176 to 3,417,552 gallons/year (savings anticipated post one to two years after conversion using the low- and high-end estimates noted above). If awarded the grant through Reclamation, the City has the potential of doubling this potential water savings between the range of 3,346,353 to 6,835,104 gallons per year. This savings is assumed to persist for as long as the converted landscapes remain in place.

Broader Benefits - Water Supply Reliability:

In the face of increasing frequency and severity of droughts, attributed to climatic uncertainty driven by climate change and its influence to temporal shifting of precipitation and snow melt along the northern sierras, which the City's main source of water supply is originally derived from (through Zone 7 Water Agency allocation of State Water Project water supply imported into the region from Lake Oroville which is filled by snow melt/rainfall within the Feather River Watershed), regional adaptations that focus on solutions that provide long-term benefits to reduce water demand and maintain the persistence of that demand reduction are key strategies for water supply reliability planning.

Reduced water demand throughout the community will improve the City's potable water supply reliability. Studies, as those previously noted, have demonstrated the effectiveness of lawn conversion into drought tolerant landscapes, as measures that reduce long-term water demand.

Geographic Scope of Benefits:

Though the City's EFLC Rebate directly benefits water users within the City's water service area boundary, the City works together with regional partners, Zone 7 and the Tri-Valley Water Retailers (there are four retailers that service water to the Tri-Valley Region, supplied by Zone 7), to offer regional water conservation messaging and programs. The increased movement and education within Pleasanton, will have broader impacts on the surrounding cities since residents from different service areas also attend events within Pleasanton. Furthermore, by reducing overall water use, the City is effectively modestly reducing the demand for imported water supply, as well as groundwater pumping from the local water basins.

Benefits to Local Sectors and Economies:

While it is not required by the program, a large majority of applicants select to use professional landscaping services to complete their lawn conversion projects. Applicants and hired contractors utilize local vendors and nurseries that specialize in high efficiency irrigation

equipment, drought tolerant/water wise plant materials, and compost/mulch. Furthermore, the future maintenance and management of these transformed landscapes will support local businesses for years to come.

Increased Collaboration:

As discussed above, the City works together with the Tri-Valley Water Retailers and their potable water wholesaler, Zone 7, (the Tri-Valley Water Retailers include: the City of Pleasanton, California Water Service-Livermore District, City of Livermore, Dublin San Ramon Services District). Together this group collaborates on regional water conservation programming. The addition of the City's EFLC Rebate will result in increased collaboration with Zone 7, which administers a regional lawn conversion rebate program, which Applicants need to participate in as part of the eligibility for the City EFLC Rebate.

In addition, the City's EFLC includes the collaboration with local organizations which oversee the new Senate Bill 1383 Procurement of Recovered Organic Waste Products requirement of local cities, including the City of Pleasanton. The City's EFLC inclusion of compost and mulch materials provides a beneficial credit towards meeting these procurement requirements through this collaboration.

Broader Environmental Benefits:

In March of 2022, the City of Pleasanton City Council approved a modification to the City's existing original lawn conversion program to 1) include best management practices to ensure lawn conversion projects have multiple ecological benefits to the community, to align the program with the City's Climate Action Plan (CAP) primary objectives, and 2) increase the rebate offer to provide more incentive to water customers to select this ecologically safe approach to lawn conversion projects.

Under the new EFLC Program, applicants are required to convert their lawns using all the ecologically sustainable practices laid out in the terms and conditions, including:

- Sheet mulching as the method of lawn removal – rather than scrapping off the top layer to haul off into the landfill or use of herbicides to kill the grass,
- The use of a 1-inch of compost and 3-inches of mulch - which helps to increase carbon sequestration and water retention within the soil,
- The selection of at least two varieties of California native plant species (multiple plants of the same species is required) - to support the local wildlife and native insects,
- Cool season planting – to reduce water demand during the plant establishment period.

Furthermore, these requirements help to protect the City's groundwater basin and local surface waters with the elimination of herbicides used to kill off lawns targeted for conversion. This approach of multi-ecologically beneficial approach, broader than water savings alone, together support the City's CAP, the City's stormwater National Pollutant Discharge Elimination System (NPDES) permit, and the City's 2020 Urban Water Management Plan.

Additional Benefits:

A large survey was conducted by the AWE in drought prone areas of the United States, found that one of the main challenges in gaining participation in lawn conversion programs has a lot to do with the perception of what the general public thinks is an aesthetically appealing landscape. The ability for the community to observe more of varieties of drought tolerant landscaping within their community, will help to both habituate and appeal to people that may prefer green lawn landscapes. With more drought tolerant landscapes within the community, these act as ambassador landscapes to improve the familiarity and comfort with water-efficient landscapes and show the community that water efficient landscapes can in fact be beautiful. This program gives the community real, local examples of water-efficient landscaping and helps to educate people on way of life changes that will passively reduce their water use and help the community grow more resilient to future water challenges, including the current multi-year drought California is currently experiencing.

E.1.2 Evaluation Criterion B – Planning Efforts Supporting the Project (30 Points)

Describe how this project is supported by existing planning efforts.

This Project is supported by a number of City Planning efforts. The first is within the City's current and past Urban Water Management Plan (UWMP). In accordance with the Urban Water Management Planning Act (established by Assembly Bill 797 in 1983, and has been subsequently updated over time by the State Legislature), the UWMP provides a framework for long-term water supply planning and documents how urban water suppliers are carrying out their long-term resource planning responsibilities to ensure adequate water supplies are available to meet existing and future water demands. Chapter 9 of the City's Urban Water Management Plan, Demand Management Measures (DMM), details efforts the City is implementing to sustainably manage water resources. The implementation of these DMMs helps the City improve water service reliability and helps meet City and State water conservation goals. Water-efficient landscape programming through a lawn conversion rebate program is specifically identified as one of the City's measures to reduce the demand of potable water by incentivizing customers to convert high water need lawns into drought tolerant landscaping.

In addition to the UWMP, the City recently adopted its Climate Action Plan. Primary objectives of the CAP , include expanded incentives to reduce water use, including water efficiency retrofits. Furthermore, in March 2022, City Council approved a modification to the City's existing lawn conversion program in support of the CAP efforts, as well as the incorporation of other ecologically beneficial elements into the lawn conversion program (to what is now the proposed project EFLC Rebate in this request) that support additional identified primary objectives of the CAP Update.

The City has a long-standing history of offering water conservation assistance to water customers since the 1990s, alongside Zone 7. The City first started offering a lawn conversion rebate in 2012 to help enhance Zone 7's lawn conversion rebate offer to further encourage water customers to make the conversion to climate-adaptive landscaping.

E.1.3 Evaluation Criterion C – Implementation and Results (20 Points)

Describe the implementation plan for the proposed project.

Project Schedule:

Overall, the proposed project incorporates seasonality, but by its nature some of the project efforts take place year-round. The breakdown of project tasks are as follows:

Task 1 - Public Outreach (Year-Round): After July 1, 2022, the City will ramp up public outreach efforts via social media posts, website posts, outreach events including potential webinars or in-person EFLC Rebate workshops, to obtain more interest in the program. Public outreach efforts regarding the EFLC rebate program is conducted year-round, however, efforts increase in late summer and fall, to concentrate attention to the program before the planting season starts.

Task 2 - Application Reviews (Year-Round): Staff reviews applications as they are received year-round. Interested eligible water customers are welcomed to start the application process at any time they are ready to consider an EFLC Rebate lawn conversion project. Application reviews include general design review, confirmation of plant selection fitting the defined criteria for approval, and a pre-site inspection to confirm an existing irrigation system is in place, as well as area measurement confirmation. Once all eligibility elements are confirmed and in order, applications are approved.

Task 3 – Applicants Conduct their Lawn Conversion Projects (September – March) Upon application approval by City staff, Applicants can initiate the sheet mulching/irrigation capping component of their EFLC project. The actual plantings of their approved plant list must take place during the cool season (September – February). Following the completion of their projects, Applicants submit their receipts for their eligible costs, and necessary project photos.

Task 4 – Post-EFLC Project Review/Completion (September – June): As individual EFLC Rebate projects are completed, staff will review the Applicant's submitted materials and conduct a post-site inspection to confirm the elements of the approved application were included/followed during the implementation of the lawn conversion. Once the post-project review is determined to be satisfactory by City staff, the City will provide the rebate to the Applicant.

Table 1 shows the implementation schedule as described above.

Table 1. Proposed Project Implementation Schedule

Task	Task Duration Over Year 1					
	July/Aug	Sept/Oct	Nov/Dec	Jan/Feb	Mar/Apr	May/June
Task 1						
Task 2						
Task 3						
Task 4						

The EFLC Rebate Program will remain within the City’s Water Conservation Program as a water-efficiency strategy following year 1. Water-efficiency improvements from the rebated projects will be monitored over time. As previously mentioned, since the plants require initial establishment, analysis of Applicant water use post-lawn conversion, will be informative following at least one-year post-installation.

Permits, Engineering, Policies, and Environmental Compliance:

The City does not anticipate any permit requirements as all work will be completed on private property. The City also does not expect any engineering or design work on its own behalf, since all applicants are non-City of Pleasanton water customers. Additionally, no new policies or modifications to existing policies are required to implement this program, other than the City’s approval and execution of the grant agreement with the Bureau of Reclamation. The City does not anticipate any additional environmental compliance review beyond Reclamation’s environmental review in consideration of the grant award.

E 1.4 Evaluation Criterion D – Nexus to Reclamation (5 Points)

Describe the nexus between the proposed project and a Reclamation project or activity.

As described earlier, approximately 80% of the City’s water supply is purchased from Zone 7, which in turn, in a normal year, imports most of that purchased water from California Department of Water Resources allocations through the State Water Project. This water makes its way from the Lake Oroville Dam and eventually reaches the Sacramento San Joaquin Delta. Reclamation shares a project, called the Delta Division Project, within the Sacramento San Joaquin Delta as well. Though the City’s proposed project is not directly a part of the Delta Division Project, reduced demand from the Pleasanton water service area, reduces the overall draw upon water, which can reduce strain upon the Sacramento San Joaquin Delta as a whole.

E 1.5 Evaluation Criterion E - Presidential & Department of the Interior Priorities (10 Points)

Describe how the proposed project supports:

E. 1.5.1 Climate Change – *Combating the Climate Crisis:*

The United States and the world face a profound climate crisis. As we continue to feel the impacts of climate change both regionally and locally, there has never been a more important time to take action. As mentioned above in Criterion A, the benefits of the City's EFLC program extends beyond just water savings alone. The program supports the City's Climate Action Plan and is specifically designed to use ecologically sustainable methods of lawn removal to help fight against the impacts of climate change and create a more climate resilient landscape.

The most profound impact the EFLC program has on addressing the impact of climate change and helping to combat the climate crisis by developing climate adaptive landscaping. As climate change continues to impact snowfall, increase drought frequency, and intensify natural disasters, water supply reliability and resilience is greatly affected. These climate adaptive landscapes are able to responds to such changes in climate without putting extra stress on our water supplies. This allows the City to more efficiently navigate the impacts of climate change while continuing to meet both current and future water demands. The EFLC program in turn, helps strengthen water supply sustainability and increases resilience to climate change.

The EFLC program also address the impact of greenhouse gasses by potentially reducing the amount of carbon dioxide in our atmosphere. Greenhouse gases continue to be the driving force behind climate change. Increased carbon sequestration, through the application of compost and mulch, as required by the program, is anticipated.

In addition, the EFLC program also has the added benefit of reducing pollution runoff into the local waterways by the elimination of herbicide runoff from chemical lawn removal methods. Plus, the requirement of sheet mulching minimizes the need for fertilizer applications commonly used on lawns. Thereby, reducing fertilizer runoff into our local water ways. The waterways within the City drain into the San Francisco Bay.

Lastly, the EFLC requires a 50% plant coverage on converted landscapes as well as the use of California native species. These conditions are designed to protect and attract pollinators and birds. This helps to increase overall biodiversity and promote climate resiliency.

E. 1.5.2 Disadvantaged or Underserved Communities

The EFLC program is available to all City residents within the City's water service area. There will be no negative or beneficial impacts on disadvantaged or underserved communities.

E. 1.5.3 Tribal Benefits

There are not Tribal lands in within the project location. There will be no beneficial or negative impacts to Tribal Nations or their lands under this project.

Overlap or Duplication of Effort Statement *(D.2.2.9)*

There is no overlap between the proposed project and other active or anticipated proposals or projects. Likewise, the proposal submitted for consideration does not in any way duplicate any proposal or project that has been or will be submitted for funding consideration to any other potential funding source.

Project Budget

Funding plan

The non-Federal share of project costs will come out of the City’s Water Enterprise Fund, which is approved through the City’s two-year budget approval process. In the March 2022 decision by City Council to approve the City’s new EFLC Rebate Program approach, additional funding was approved for the enhanced rebate offer through this updated rebate. No other sources of funding are necessary from third-party sources to cover the non-Federal share of the project cost. The City is not seeking to include any staffing wage/salary budget reimbursement through this request, as these are paid for expenses through the City.

Budget proposal

Table 2. Summary of Non-Federal and Federal Funding Sources

FUNDING SOURCES	AMOUNT
Non-Federal Entities	
1. City of Pleasanton	\$45,000
REQUESTED RECLMATION FUNDING	\$45,000

Table 3. Total Project Cost

SOURCE	AMOUNT
Costs to be reimbursed with the requested Federal funding	\$45,000
Costs to be paid by applicant	\$45,000
Value of third-party contributions	NA
TOTAL PROJECT COST	\$90,000

Table 4. Detail of Proposed Project Cost

BUDGET ITEM DESCRIPTION	COMPUTATION		Quantity Type	Total Cost
	\$/Unit	Quantity		
Supplies and Materials				
Rebates	\$80,000	1	Total rebate expenditures over 1 fiscal year	\$80,000
Other				
Public Outreach/Marketing of Program	\$10,000	1	Total expenditures for outreach over 1 fiscal year	\$10,000
TOTAL ESTIMATED PROJECT COSTS (non-personnel)				\$90,000

Project Manager: Rita Di Candia, Environmental Services Manger

Support staff: Environmental Services Specialist and Water Conservation Assistant

Budget Narrative:

As discussed above, the City does not wish to seek reimbursement for labor costs of the personnel that facilitate the proposed project. This includes fringe benefits associated with their labor.

Supplies and Materials

The City seeks to double its funding available for the City EFLC Rebate program to water customers. The rebate offer to both non-dedicated irrigation metered customers (residential and mixed-use multi-family, and commercial customers) and dedicated irrigation metered customers, is the non-physical supply/material being offered by the City through this rebate program.

Other Expenses

Budget has been proposed towards public outreach to directly market the City's EFLC Rebate. Activities may include paid ads on social media sites, print advertising, holding informational webinars or workshops with hired guest speakers to help highlight the benefits of lawn conversions and its potential water-savings.

Environmental and Regulatory Compliance Costs

The City does not anticipate any environmental and cultural resources expenditures as a result of this proposed project. All locations where the lawn conversions end up taking place will be private, already developed residential or commercially zoned landscapes.

Environmental and Cultural Resources Compliance

Proposed Impact to the Surrounding Environment: The proposed project is believed to have little to no impact on the surrounding area. Since the project is designed to require the use of ecologically friendly landscape practices, existing lawn will be left in place and sheet mulched over top. This eliminates the risk of soil, dust, air, and water pollution. Under the project, animal habitat will increase.

Project Impact to Threatened or Endangered Species: There are no anticipated negative impacts to threatened or endangered species as a result of implementation of the proposed project. All rebates provided under the EFLC Rebate are for the replacement of residential or commercially developed, private landscapes currently irrigating non-native lawn grasses through the Applicant's existing irrigation system.

The transformation of landscapes as a result of the EFLC Rebate is intended to have beneficial ecological effects, such as providing habitat to local fauna, supporting biodiversity, and reducing application of herbicides/pesticides as well as fertilizers.

Project Impact on Wetlands and Surface Water: There are surface waters within the City boundary that fall under CWA jurisdiction as "Water of the US". However, the City does not anticipate any of the waterways would be affected by any of the potential water customer sites that participate in an EFLC Rebate project. Participating Applicant properties are zoned residential or commercial properties. In addition, the requirements of the EFLC Rebate program include best landscape management practices to minimize negative impact to waterways and prevent runoff.

When Was the Water Delivery System Constructed:

The City of Pleasanton originally took over the water service distribution system from the Pleasanton Township County Water District in the mid-1960s. A subsequent four phased series of projects that stemmed from the 1968 Water Bond Project was responsible for building the backbone of the potable water delivery system.

Project Impact on Irrigation Systems: All projects are completed on private property and will have no negative impacts to the City's water system. Under the WEL program, applicants are required to cap off current sprinkler systems. If an irrigation system is to be installed, it must be drip irrigation.

Project Impact on Historic Places: The project will have no impact on historical places.

Project Impact on Known Archeological Sites: The proposed project activity is projected not to have any impact on known archeological sites. All lawn conversions that would be eligible for this rebate are located on already developed residential or commercial landscapes.

Project Impact on Low Income or Minority Populations: The rebate program will be open to any City water customer, as outlined under the program's eligibility requirements, and will not have any disproportionately high and adverse effect on low income or minority populations.

Project Impact on Sacred Site or Tribal Lands: The project will have no impact on tribal or sacred lands.

Project Impact on the Spread of Noxious Weeds or Non-Native Invasive Species: The WEL program requires the use of ecologically sound practices such as sheet mulching. This helps to smother and kill off and noxious weeds that would otherwise be left in place. Additionally, the program requires and encourages the use of California native species. This program may have a positive effect on the reduction of noxious weeds through the described above program requirements.

Requires Permits or Approvals

The City does not anticipate the need to obtain any permits or outside approvals to conduct the proposed project. All of the EFLC Rebate projects will take place on private residential or commercial properties with existing irrigation systems in place.

Letter of Support and Letters of Partnership

A letter of project support was submitted by the City's water wholesaler, Zone 7. See Attachment.

Official Resolution

An official resolution from the City of Pleasanton meeting the mandatory requirements set forth in the NOFO will be provided to sha-dro-fafoa@usbr.gov within 30 days after the application deadline.

Conflict of Interest Disclosure

The City is not aware of any actual or potential conflicts of interest with the request of this grant award.



100 North Canyons Parkway
Livermore, CA 94551
(925) 454-5000

April 19, 2022

Bureau of Reclamation
Financial Assistance Operations
P.O. Box 25007
Denver, CO 80225

Subject: Support for the City of Pleasanton's Application for WaterSMART Small-Scale Water Efficiency Project Grant: Eco-Friendly Lawn Conversion Rebate Program

Dear Bureau of Reclamation WaterSMART Grant Review Board:

I write to express my support for the City of Pleasanton's application for grant funding through the WaterSMART Small-Scale Water Efficiency Project Grant, for their Eco-Friendly Lawn Conversion Rebate Program.

In partnership with Zone 7 Water Agency, the City of Pleasanton's commitment towards offering a tandem lawn conversion rebate to their water customers, helps to enhance interest in the long-term water saving strategy of converting local landscapes into climate-adaptive landscapes. In the face of repeated, multi-year droughts, water conservation efforts such as lawn conversion projects, are a necessary strategy towards protecting the local water supply.

Thank you for your consideration of the City of Pleasanton's application for grant funding which will help to foster movement towards a climate-adaptive landscaping throughout the Pleasanton community.

Sincerely,

DocuSigned by:

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Valerie Pryor
General Manager