



August 31, 2022

Attention: Ashley Gilreath
Attention: Urban Community Drought Relief Program
Financial Assistance Branch
Department of Water Resources
P.O. Box 943836
Sacramento, CA 94236
urbandrought@water.ca.gov

Subject: Coachella Valley RWMG Comments on DWR's Draft 2022 Urban Community Drought Relief Program Guidelines and Proposal Solicitation Package

Dear Ms. Gilreath,

The Coachella Valley Regional Water Management Group (CVRWMG) would like to start by thanking the California Department of Water Resources (DWR) for the opportunity to comment on the 2022 Urban Community Drought Relief Program Guidelines and Proposal Solicitation Package (GL/PSP) that were released on August 16, 2022.

The CVRWMG is comprised of the Coachella Water Authority, Coachella Valley Water District, Desert Water Agency, Indio Water Authority, Mission Springs Water District, and Valley Sanitary District. The group represents a collaborative effort to implement the Coachella Valley Integrated Regional Management (IRWM) Plan to address the water resources planning needs of the Coachella Valley. The CVRWMG's IRWM Region is located in central Riverside County, within the Colorado River Funding Area.

The CVRWMG is appreciative of the fact that DWR is offering financial assistance to address drought impacts across the State. We also appreciate that DWR is setting aside approximately \$85 million dollars for underrepresented communities and Tribes. These communities are extremely vulnerable to drought and climate change impacts. This set aside funding will provide immediate relief to those who are threatened with the loss or contamination of water supplies.

Specific comments on the GL/PSP are as follows:

1. Clarify Turf Replacement Projects Eligibility

We would like to thank DWR for setting aside approximately \$38 million dollars in turf replacement projects. Turf replacement projects are a priority in the Coachella Valley due to the Region's arid climate, and there is a need to continue these projects to decrease outdoor water use in response to ongoing drought conditions.

In Table 3 of the draft GL/PSP, it states that turf replacement projects are "required to incorporate [a] measure to ensure infiltration is maximized." However, the draft GL/PSP does not indicate what type of measure applicants should incorporate. We request DWR to clarify how they are defining a "measure to ensure infiltration is maximized." The CVRWGM would like to ensure that all interested and eligible applicants are aware of this criterion to prepare a responsive and competitive application for consideration.

2. Prioritization for Funding Criteria

We appreciate that DWR is prioritizing Urban Water Suppliers (UWSs) that have activated a higher stage of their Water Shortage Contingency Plans (WSCPs). The funding from the Urban Community Drought Relief Program will help these UWSs provide water to communities that are facing the loss or contamination of their water supplies. Fortunately, the CVRWGM has implemented projects that have diversified our water supply portfolio, and as result, we do not need to activate a higher stage of our WSCPs. However, we are in a region where there is projected rapid growth and we rely on water from the Colorado River Basin and the State Water Project to supplement local groundwater. These water supplies are extremely vulnerable to drought conditions. On August 16, 2022, the U.S. Bureau of Reclamation announced steeper cuts to the Colorado River water in 2023 due to current drought conditions. California will not receive cuts due to the State having higher priority rights, but this may change if drought conditions continue to worsen. Our region is very concerned about the impact of drought, and we are proactively implementing demand management programs and recycled water projects. The CVRWGM requests DWR add a criterion that prioritizes UWSs that rely on water supplies from the Colorado River Basin and the State Water Project to help alleviate the stresses on future vulnerability of these sources.

3. Clarify Equitable Distribution of Funds

Page 13 of the GL/PSP states that:

DWR will make efforts to award funds equitably throughout the areas of the state eligible to receive drought funding. DWR may make partial awards to ensure equitable distribution of funding.

We appreciate that DWR will be making an effort to award funds equitably. However, the term "equitably" is vague and can be defined and interpreted in multiple ways. We request that DWR clarify how it intends to "equitably" distribute funds throughout the State.

Thank you for your willingness to work with the applicants to improve the process. We look forward to continued collaboration with DWR.

Sincerely,

A handwritten signature in black ink, appearing to read 'Zoe Rdr', written in a cursive style.

Zoe Rodriguez del Rey
On behalf of the Coachella Valley Regional Water Management Group
Water Resources Manager
Coachella Valley Water District

cc:

Honorable State Senator Melissa Melendez
Honorable Assemblyman Eduardo Garcia
Honorable Assemblyman Chad Mayes

CVRWMG agency representatives:

Ashley Metzger, Desert Water Agency
Ron Buchwald, Valley Sanitary District
Castulo Estrada, Coachella Water Authority
Reymundo Trejo, Indio Water Authority
Steve Ledbetter, TKE Engineering / Mission Springs Water District