



February 17, 2022

Ashley Gilreath
Attention: Round 2 IRWM Implementation Grant Program
Financial Assistance Branch
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236
dwr_irwm@water.ca.gov

Subject: Coachella Valley RWMG Comments on Proposition 1 Round 2 Implementation Grant Draft PSP

Dear Ms. Gilreath:

The Coachella Valley Regional Water Management Group (CVRWMG) appreciates the opportunity to comment on the California Department of Water Resources Proposition 1 Round 2 (P1R2) Implementation Grant Draft PSP that was released December 10, 2021.

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 Water 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.

CVRWMG is appreciative of DWR's efforts to streamline the application process overall and particularly, for regions that have established a funding split within their funding area. Allowing for local prioritization, as opposed to regional competition, will benefit all of water users in a region, and we appreciate that DWR trusts each RWMG to determine which projects are best suited to meet IRWM goals within their region. The streamlined application process will also reduce the burden and associated costs of completing the application, particularly for local project sponsors from disadvantaged communities.

Specific comments on the PSP are as follows:

1. Clarify Deadline for Project Completion

Projects awarded under P1R2 must be completed by December 31, 2026, however, the draft PSP was issued in December 2021 and will likely not be finalized until late March 2022. The CVRWGMG appreciates that the delay was due to issuance of the “Drought Grant” PSP and agrees with DWR’s priorities that due to the urgency of the drought, that program deserved priority over the P1R2 PSP. For P1R2 and the reasonable delay in the issuance of the draft, PSP, it is not clear how the two application deadlines for P1R2 will be adjusted, which were originally planned for March 2022 and September 2022. After the final PSP is released, the RWMGs will either need to complete a call for projects based on the revised priorities and conditions in the final PSP, or review and revise their project selection, and compile an application. It also takes DWR time to review the application and issue a grant agreement. Therefore, an agreement may not be issued until December 2022 at the earliest if DWR sets the first application period for late May 2022. The CVRWGMG requests that DWR set reasonable first and second P1R2 application deadlines to accommodate the delay in PSP issuance. At the Virtual Workshop on Draft Guidelines and PSP, DWR held a poll asking attendees their preferred application deadlines. The choices were August 2022 and December 2022, October 2022 and February 2023, or November 2022. Based on these choices, the CVRWGMG prefers the August 2022 and December 2022 application deadlines. We also request DWR to extend the deadline for project completion past December 31, 2026. If the call for projects and application are rushed and the local project sponsors are also faced with a tight completion deadline, the RWMGs and DWR are unlikely to get projects that ultimately are best for meeting the integrated water management needs of each region.

As DWR anticipates that there will be two deadlines for the application, the CVRWGMG requests that the completion deadline for those choosing the later application timeframe also be extended accordingly.

2. Clarify Replacement Project Requirements

DWR has indicated that it may allow for replacement projects in the event that a selected project cannot be completed or is delayed. The CVRWGMG appreciates this opportunity to prepare for the unexpected. The draft PSP indicates that the project must be included in the list of vetted projects; however, it is unclear how detailed the description of those projects should be and when the details should be submitted to DWR. Additionally, the draft PSP does not explain how the list of vetted projects should be submitted to DWR. The CVRWGMG requests clarification on the level of detail required by DWR and instructions how to submit the list of vetted projects.

Thank you for your willingness to work with the applicants to improve the process. The CVRWGMG looks 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