



November 29, 2021

Attention: Kelley List, P.G.

Attention: Sustainable Groundwater Management Grant Program

SGWP@water.ca.gov

Subject: Coachella Valley IRWM Comments on DWR’s draft Sustainable Groundwater Management Grant Program’s Sustainable Groundwater Management Act Implementation Funding Guidelines (GL) and Proposal Solicitation Package (PSP)

Dear Ms. List:

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 Sustainable Groundwater Management (SGM) Grant Program’s Sustainable Groundwater Management Act (SGMA) Implementation funding that was released on October 13, 2021. The CVRWMG is comprised of both water and wastewater agencies in the Coachella Valley, including the Alternative Plan Agencies for the Indio and Mission Creek Subbasins. The Indio Subbasin Groundwater Sustainability Agencies (GSAs) (<http://www.indiosubbasinsgma.org/>) are the Coachella Valley Water District (CVWD), Desert Water Agency (DWA), Indio Water Authority (IWA), and Coachella Water Authority (CWA). CVWD and DWA are GSAs within the Mission Creek Subbasin and together with Mission Springs Water District (MSWD) comprise the Management Committee (<http://www.missioncreeksubbasinsgma.org/>). The Indio and Mission Creek Subbasins each have approved Alternative Plans. Both basins are designated as medium-priority subbasins by DWR.

CVRWMG Agency	Alternative Plan Agencies	
	Indio Subbasin	Mission Creek Subbasin
Coachella Valley Water District	✓	✓
Desert Water Agency	✓	✓
Indio Water Authority	✓	
Coachella Water Authority	✓	
Mission Springs Water District		✓
Valley Sanitary District*		

**Valley Sanitary District is a wastewater agency, and its service area overlies portions of the Indio Subbasin.*

The CVRWGM is appreciative of the fact the DWR respects the investments that Regional Water Management Groups (RWMGs) and GSAs have made to promote healthy and sustainable groundwater basins that align with the goals and objectives of SGMA. Our specific comments on the GL and PSP are as follows:

1. Make Medium and High Priority Basin SGMA Implementation Funding (Round 2) Solicitation Process Similar to Critically Overdrafted (COD) Basin SGMA Implementation (Round 1) Solicitation Process

The CVRWGM appreciates the opportunity for medium and high priority basins to apply for funding under Round 2 of the SGM Grant Program's SGMA Implementation funding. The total \$204.5 million dollars available in Round 2 will improve groundwater supply and quality in the many medium and high priority basins in the state. However, the solicitation process for Round 2 is completely different from the solicitation process in Round 1.

The PSP directs Round 1 applicants to submit a Spending Plan to obtain funding and include copies of the completed scoring criteria as outlined in Table 7 in the PSP, while Round 2 applicants are required to complete and submit an application using DWR's GRanTS electronic submittal tool. Round 1 applicants are required to develop a project review committee and complete a self-evaluation for DWR review. Whereas Round 2 applicants are required to complete a much longer application which will be evaluated, scored, and ranked based on the evaluation questions in Table 7 – Application Evaluation Criteria. The Round 1 Spending Plan method of applying for funds is simpler and more direct, while the Round 2 application process can be burdensome and expensive, particularly for smaller GSAs. The simplicity of the Spending Plan and self-evaluation criteria can potentially also be used for Round 2, even though this round is competitive. We request that DWR administer a similar solicitation process in Round 2 to be consistent and to provide the same opportunities given to COD basins to the medium and high priority basins.

2. Clarify the Program Preferences

Page 13 of the GL states that:

Preference will be given to projects that leverage private, federal, or local funding or produce the greatest public benefits that address the most critical statewide needs.

While the CVRWGM appreciates the intent of this statement, please explain and define what DWR considers the "greatest public benefits" and the "most critical statewide needs." Clear evaluation criteria will help our GSAs to select projects and management actions that achieve both Subbasin and Statewide goals.

3. Clarify Application Evaluation Criteria

Question 3 of the Table 7 Application Evaluation Criteria (page 27) in the PSP states:

Does the proposal demonstrate the goals, objectives, and needs of the proposed Project or Component and how the proposed Project or Component meet those?

The CVRWGM appreciates the purpose of this question, but the question is vague and can be interpreted and answered in multiple ways. We request that DWR more clearly explain how the answers to this question will be scored across the State.

4. CEQA

The CVRWMG appreciates that DWR has allowed the GSAs until the time of agreement execution to complete the CEQA process. This flexibility allows the GSAs time to complete the necessary planning, design, and environmental phases of projects within a reasonable timeline.

5. Include the Use of In-Lieu Projects in Eligible Project Types and Activities

Coachella Valley GSAs frequently provide non-potable water, either raw surface water or recycled water, to groundwater pumpers such as golf courses to use for irrigation to reduce or eliminate their direct pumping from the groundwater basin. As there is not sufficient recycled water to meet all of these pumpers' needs, local and imported surface water is provided to meet some of the demand. Providing "in-lieu" water to these large groundwater users is an important component of the Coachella Valley Alternative Plan Agencies' groundwater management plans. While direct use of surface water, stormwater, and recycled water for groundwater recharge is listed as eligible,¹ providing non-potable water directly to groundwater pumpers in lieu of recharge should be specified as an eligible project type.

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

Sincerely,



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

¹ Page 7 of PSP: "Activities and/or tasks that consist of the development of groundwater recharge projects with surface water, stormwater, recycled water, and other conjunctive use projects"
