

# Coachella Valley Integrated Regional Water Management

## 2019 IRWM Implementation Grant Proposal

### Economically Distressed Area

Attachment 8 consists of the following information for each project claiming benefits to an economically distressed area (EDA):

1. **Percentage of Project Benefits Provided to an EDA**
2. **Map of Project Benefit Area and Location of EDA**
3. **Letters of Support**
4. **Justification of Alternative Data**

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### EDA Definition

As defined by DWR, an EDA is a municipality with a population of 20,000 persons or less, a rural county, or a reasonably isolated and divisible segment of a larger municipality with a population of 20,000 persons or less, with a median household income (MHI) that is less than 85% (\$54,216<sup>1</sup>) of the Statewide MHI, and with one or more of the following conditions:

1. Financial hardship
2. Unemployment rate at least 2% of higher than statewide average
3. Low population density

Reasonably isolated and divisible segment: 1) A community, Census block, tract, or other area within a larger municipality that is separated by major transportation corridors, waterbodies, or other physical barriers; or 2) A segment with separate (disconnected from municipal services) water or wastewater services or other jurisdictional boundaries, such as senior living, fixed income, or other communities, where more than a quarter of the population does not have access to an automobile, or where more than a quarter of the population are non-English speakers.

Financial hardship: If the MHI for the community is less than 80% of the statewide annual MHI, or if the MHI for the community is less than 85% of the regional or local MHI. Income data may be calculated using U.S. Census data, American Community Survey (ACS) data, income surveys, or other justifiable local knowledge (e.g., neighborhood has been designated low-income by its municipality, or community is a state- or federally-designated colonia).

Unemployment rate at least 2% higher than statewide average: The statewide average unemployment rate<sup>2</sup> is 4.2% as of May 2018, and thus communities having 6.2% and higher unemployment rates would meet this criterion. Local unemployment rates may use U.S. Census data, ACS data, or local economic agencies, so long as the data use a reasonable scale.

Low population density: Defined as less than 100 persons per square mile, consistent with DWR's EDA mapping tool's methodology. Population density may be determined using ACS data, or local data.

Areas mapped on DWR's EDA Mapping Tool (<https://gis.water.ca.gov/app/edas/>) are considered EDAs.

### Funding Match Waiver

CVRWMG is not requesting a funding match waiver based on EDA status for any projects in this application.

### Documentation of Presence and Needs of an EDA

MHIs in the Coachella Valley IRWM Region were estimated through an analysis of the 2016 ACS data at the Census tract and block-group levels. Census tracts are small, relatively permanent geographic entities within counties delineated by a committee of local data users. Block-groups are similar to Census tracts, only at a finer scale (i.e., block groups are nested within Census tracts). Past DAC mapping with ACS data has shown that Census tracts designated as DAC do not always reflect the Region's understanding of where DACs are located, therefore, this same assumption will be used for EDA. This may be a reflection of the scale of the data, the fact that Census tracts do not directly align with Region boundaries, or data gaps related to the demographic of the population, which in many places may be reluctant to accurately respond to Census and survey takers.

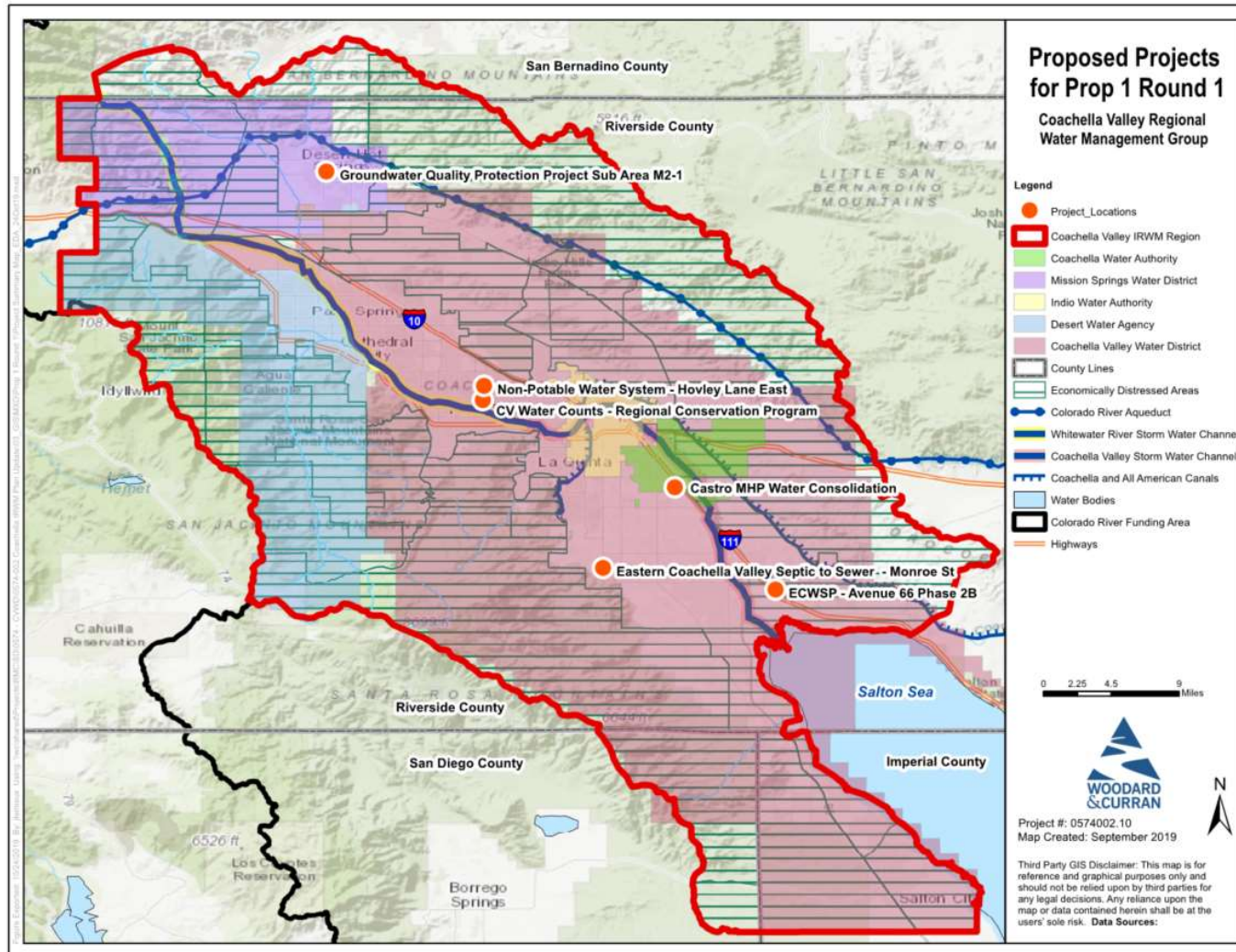
To better understand DACs in the Region (location, needs, etc.), the CVRWMG completed the *Disadvantaged Community Outreach Demonstration Program* (DAC Outreach Program) concurrent with the *2014 Coachella Valley IRWM Plan*. Findings of the DAC Outreach Program were incorporated into the *2014 Coachella Valley IRWM Plan* as Volume II. A DAC Needs Assessment is currently underway for the Colorado River Funding Area, implemented through the DAC Involvement Grant Program, and should be completed by the end of 2019. With the addition of EDAs, it will be assumed EDAs have similar needs to DACs since EDAs are comprised of DACs with more hardships than the typical DAC.

**Figures 8-1 through 8-7** show the location of EDAs in the Coachella Valley using the 2016 ACS data and ESRI Community Analysis tool and also show each of the projects included in this Proposal. As shown in **Figure 8-1** below, **68% of the CVRWMG region** qualifies as an EDA. The *CV Water Counts* program directly address the water-related needs of EDA. The remaining projects in this proposal do not directly benefit the water-related needs of EDAs, though many of the projects are adjacent to EDAs.

<sup>1</sup> American Community Survey (ACS) of the U.S. Census for the years 2012-2016

<sup>2</sup> California Employment Development Department. 2018. EDD News Release No. 18-73. Available: [https://www.edd.ca.gov/About\\_EDD/pdf/urate201806.pdf](https://www.edd.ca.gov/About_EDD/pdf/urate201806.pdf)

Figure 8-1: EDA Project Summary Map





### **Water-Related Needs of EDAs in the Coachella Valley**

Many EDAs overlap with DACs within the Coachella Valley; therefore, it is safe to assume that EDAs have the same water-related needs as DACs. There are a wide range of EDAs within the Valley due its relatively remote location (from the Southern California metropolitan areas) and desert climate. Although some resort communities exist in the Valley, a majority of the land area is open desert and farmland interspersed with low or rural density housing. Within the EDAs, there are a wide range of communities from different demographics, including migrant and seasonal farm workers, low-income families, low-income seniors, and others. Several water management issues specific to DACs, and can be assumed for EDAs as well, have been identified, and generally include drinking water supply and water quality, sanitation needs, flooding concerns, and maintaining the affordability of water.

Of the primary water-related concerns identified in the *2018 Coachella Valley IRWM/SWR Plan*, stakeholders considered wastewater and drinking water quality the most critical with specific focus on the following:

- Wastewater systems that require maintenance and DAC residents' interest in better understanding of how to maintain onsite wastewater systems to avoid failures, overflows, and other issues
- Faulty septic systems that require rehabilitation or, where feasible, connection to municipal sewer systems
- Education on the source of water supply to help individuals learn who is responsible for regulating, testing, and ensuring quality drinking water and knowing who to contact when issues arise
- Lack of access in some areas to clean drinking water (either due to lack of municipal services or through some source of contamination between the meter and the tap) and need for onsite water treatment systems or alternative water supplies, which can be cost-prohibitive

The *2018 Coachella Valley IRWM/SWR Plan* identifies three types of projects that could help to resolve needs and issues for DACs, which can be assumed is also important for EDAs. These project types include: 1) Education, 2) Drinking Water Treatment, and 3) Wastewater. Priority projects were also identified, and include outreach and education, point-of-use treatment system installation or consolidation with a larger water system, and septic-to-sewer conversion. Each of these projects helps reduce a community and/or area's dependency on the overdrafted groundwater basin, and in turn, helps minimize the frequency and magnitude of water and sewer cost increases. Projects that seek to increase water supply reliability and maintain the affordability of water directly address Objective M of the *2018 Coachella Valley IRWM/SWR Plan*, which seeks to maintain affordability of water.

### **Project Consistency with Water-Related Needs of EDAs**

One project in this proposal directly benefits EDAs: *CV Water Counts*. However, many of the other projects are adjacent to EDAs. EDA needs are not discussed in the *2018 Coachella Valley IRWM/SWR Plan*, but it is safe to assume that Coachella Valley's EDAs face similar challenges to DACs, especially since there is significant overlap between these two types of areas. Project consistency with water-related needs of EDAs is provided in the following sections.



**Table 8-1. Project Benefits to EDAs**

Project	Benefits to EDAs	EDA Nearby?	Cost Share Waiver Request Considering EDA Benefits
Castro Mobile Home Park	No	Yes	No <sup>1</sup>
CV Water Counts Regional Conservation Program	Possibly	Yes	No <sup>1</sup>
East Coachella Valley Water Supply Project – Avenue 66 Phase 2B	No	Yes	No
Groundwater Quality Protection Project Sub Area M2-1	No	Yes	No
East Coachella Valley Septic to Sewer Conversions – Monroe St	No	No	No <sup>1</sup>
Non-Potable Water System – Hovley Lane East	No	No	No

<sup>1</sup> Cost share waiver is requested based on DAC status. Please see Attachment 7.

## Direct Benefits to EDAs

### Project 2: CV Water Counts Regional Conservation Program

The CV Water Counts Regional Conservation Program will benefit EDAs within CVRWMG's collective service area by reducing water rate increases and improving water supply reliability. Overall, the CV Water Counts program will address the challenges DACs and EDAs face, such as water affordability, water supply reliability, and education on water-related issues. The Regional Turf Reduction Program will help reduce outdoor water use which will assist to keep water costs down. The Demonstration Gardens Program will educate locals on the importance of using low-maintenance, non-water intensive plants in order to reduce water usage and in turn mitigate water costs.

For the Regional Turf Reduction Program, CWA, MSWD, DWA and CVWD have EDAs within their service areas. EDA residents that apply for the incentive program will be directly benefited. Indirectly, EDAs will benefit from the reduced outdoor water demand, which will improve groundwater and imported water management and help to keep water costs low. Additionally, CWA's turf removal program will include use of local Conservation Corps labor to help low income and elderly applicants that request assistance.

The Demonstration Gardens Project will include a demonstration garden in CVWD and DWA's service area. While the CVWD demonstration garden will not be located in a DAC or EDA area, the garden will be located along a "community connector" for the CV Link alternative transportation route (<http://www.coachellavalleylink.com>). The CV Link project allows for an alternative transportation route for pedestrian, bicycles and low-speed electric vehicles, such as golf carts. These transportation routes will connect the CVWD demonstration garden to the EDA and DAC areas in the community. The DWA demonstration garden will be located at the Palm Springs International Airport, which is also a CV Link destination. Maps showing the location of the demonstration gardens are shown in **Figures 8-2**. The demonstration gardens will educate all residents, including those in DACs and EDAs, on the benefits of having drought resistant plants in their gardens. By showing the local communities the benefit of reducing water for outdoor irrigation, there will be in turn, more water supply available for other uses. This will in turn help preserve water costs and supply reliability for the Coachella Valley region.

For the Conservation Incentives Program, CWA and MSWD are also requesting funding for their water use efficiency incentives for residential and commercial properties, namely for the toilet rebate program. As part of this program, the agencies will also update its conservation website and provide additional newsletters, press releases, and other materials to advertise the incentive programs. Approximately 35% and 83% of CWA's and MSWD's service areas, respectively, are EDA and any incentives provided to residents in the EDA area would have a direct benefit to an EDA.

The 2018 Coachella Valley IRWM/SWR Plan documents that these distressed and disadvantaged communities may be disproportionately affected by increased water costs and that it is an objective for the IRWM Region to maintain water affordability. This project will benefit DAC residents by providing a cost-effective way to manage the Region's groundwater resources by reducing water demands throughout the Valley, thereby helping to avoid future water cost increases.

### Percentage of Project Benefits Provided to an EDA

**Figure 8-2** shows the location of CV Water Counts Regional Conservation Program with respect to EDAs. As explained in detail in Attachment 4, this project will serve the service areas of the CVWD, DWA, IWA, MSWD and CWA. Information in **Figure 8-2**



demonstrates that **68% of the CVRMWG region** qualifies as an EDA. While the entirety of the project service area is not EDA, a significant portion of the Region is comprised of EDAs and therefore, these EDAs will receive indirect project benefits. CV Water Counts will result in 88 acre feet per year (AFY) of reduced water pumping and the reduction of 60 tons carbon dioxide equivalent per year (CO<sub>2</sub>e/yr) emitted to the atmosphere.

<b><i>Water Supply Benefit</i></b>	<b><i>Other Benefit</i></b>
88 AFY of reduced groundwater pumping	60 tons reduction in CO <sub>2</sub> e/yr emitted to the atmosphere

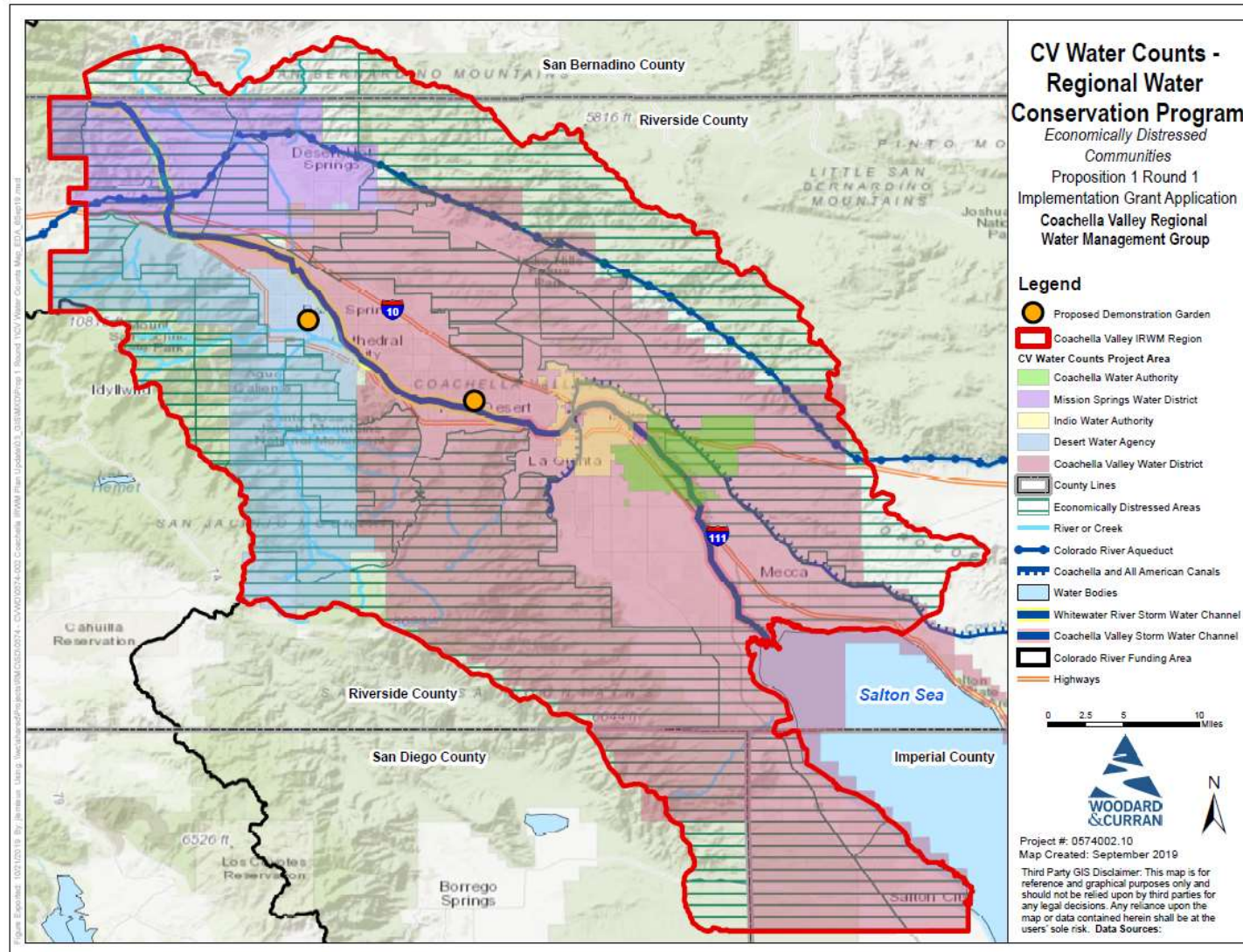
***Letters of Support***

Letters of support for this project are included in Attachment 7.

***Alternative Data***

No alternative data was used to determine EDAs in the project area.

Figure 8-2: CV Water Counts Regional Conservation Program





## Indirect Benefits to EDAs

### **Project 1: Castro Mobile Home Park Water Consolidation**

The *Castro Mobile Home Park Water Consolidation* is located within a DAC and will benefit the community by bringing potable drinking water to the residents. The MHP's groundwater well has failed and can no longer provide drinking water to the park. Additionally, the well's water quality is no longer suitable for drinking due to hexavalent chromium concentrations being higher than the drinking water standard.

Even though the EDA next to the Castro MHP does not rely on the MHP's well and will not be directly affected by the park being connected to CWA's system; the EDA will still gain other indirect benefits. One of the benefits behind this project will be the reduced overdraft of the groundwater basin, which will provide a more reliable water source for the neighboring areas.

### **Percentage of Project Benefits Provided to an EDA**

**Figure 8-3** shows the location of *Castro MHP* with respect to EDAs. This project will connect the MHP's water system to the CWA's water system, which is all located within a DAC and near an EDA. Because this project addresses two major water-related EDA and DAC needs in for Castro MHP (improving drinking water quality and supply reliability), this project will indirectly benefit the nearby EDA by improving their water quality and supply reliability since the area pumps groundwater from the same groundwater basin.

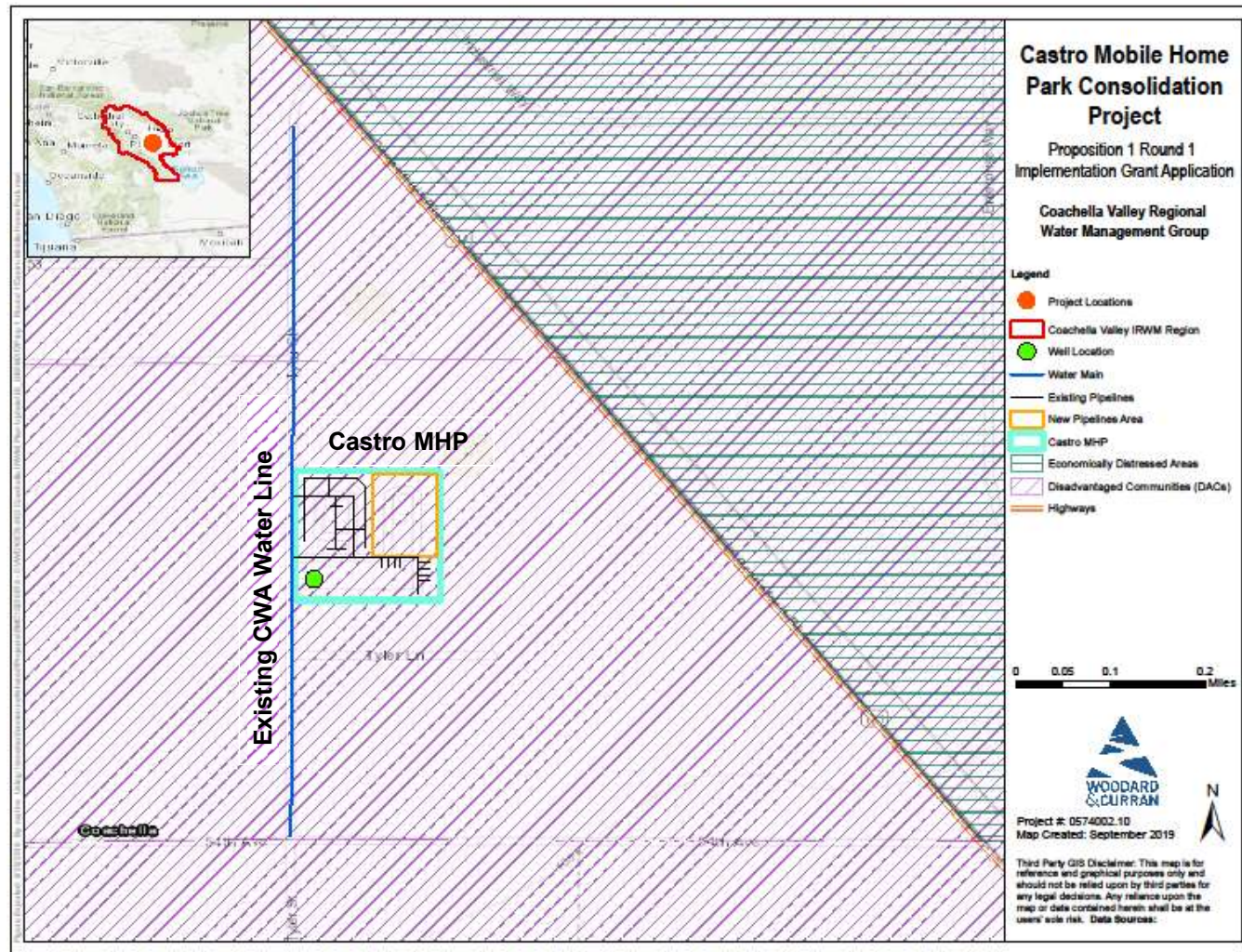
### **Letters of Support**

Letters of support for this project are included in Attachment 7.

### **Alternative Data**

No alternative data was used to determine EDAs in the project area.

Figure 8-3 Castro Mobile Home Park Water Consolidation Project – Proximity to EDA





### **Project 3: East Coachella Valley Water Supply Project – Avenue 66 Phase 2B**

The *East Coachella Valley Water Supply Project (ECVWSP) - Avenue 66 Phase 2B* Project will connect a tribal DAC to CVWD's water system as shown in **Figure 8-4**. This project is part of the overall East Coachella Valley Water Supply Project's top-rated consolidation, which will connect three small water systems: Manuela Garcia MHP, Seferino Huerta MHP and Saint Anthony MHP. The pipeline constructed in this Phase 2B project will connect directly to Manuela Garcia, and will provide reliability to the future connections to Seferino Huerta and Saint Anthony MHPs, which are both located in the EDA to the east of Manuela Garcia MHP. As CVWD continues to connect mobile home parks and other neighborhoods to their domestic water and sanitation systems, these communities will see an improvement in their water quality, water supply reliability, and cost affordability.

Furthermore, the shallow private groundwater wells that serves water supply to all three MHPs have water that exceeds drinking water standards for arsenic of 10 mg/L. At Manuela Garcia MHP, this was addressed by installing counter reverse osmosis treatment units in each mobile home in 2013. However, the potable water well appears to show signs of corrosion on the exterior and point of use treatment is not considered a long-term solution. This community is currently, and historically, facing water-related public health concerns due to the containments found in their drinking water and the system's lack of quality infrastructure.

The proposed project would address critical water quality and water supply issues by connecting the mobile home park to CVWD's water system. The community would be able to have clean, safe, potable drinking water and avoid unhealthy arsenic levels in their drinking water. This project will address critical water supply and water quality issues important in the Coachella Valley, and throughout the State of California: access to clean drinking water. The Human Right to Water Policy that is in effect in California calls for access to safe, affordable water for drinking, bathing, sanitation, and cooking for all residents.<sup>3</sup> By connecting the community to a municipal water supply system, the project will provide a long-term solution to the community's existing water supply issues. By continuing extending service to the surrounding EDAs, it will provide more opportunities for EDAs to be connected to CVWD's water system.

#### **Percentage of Project Benefits Provided to an EDA**

**Figure 8-4** shows the location of *East Coachella Valley Water Supply Project - Avenue 66 Phase 2B*, which will provide 13 AFY of clean, safe, potable drinking water to a small water system and will consolidate Manuela Garcia MHP. When combined with the two other MHPs that are located in an EDA, the project will provide 106 AFY of drinking water. **Figure 8-4** demonstrates that the entirety of the project service area is DAC with an EDA right next door (which includes Avenue 66 Phases 1A, 1B and 2A and which will be funded separately from this application). By improving drinking water service to the surrounding area of the EDA, CVWD supports these communities by avoiding environmental injustices.

#### **Letters of Support**

Letters of support for this project are included in Attachment 7.

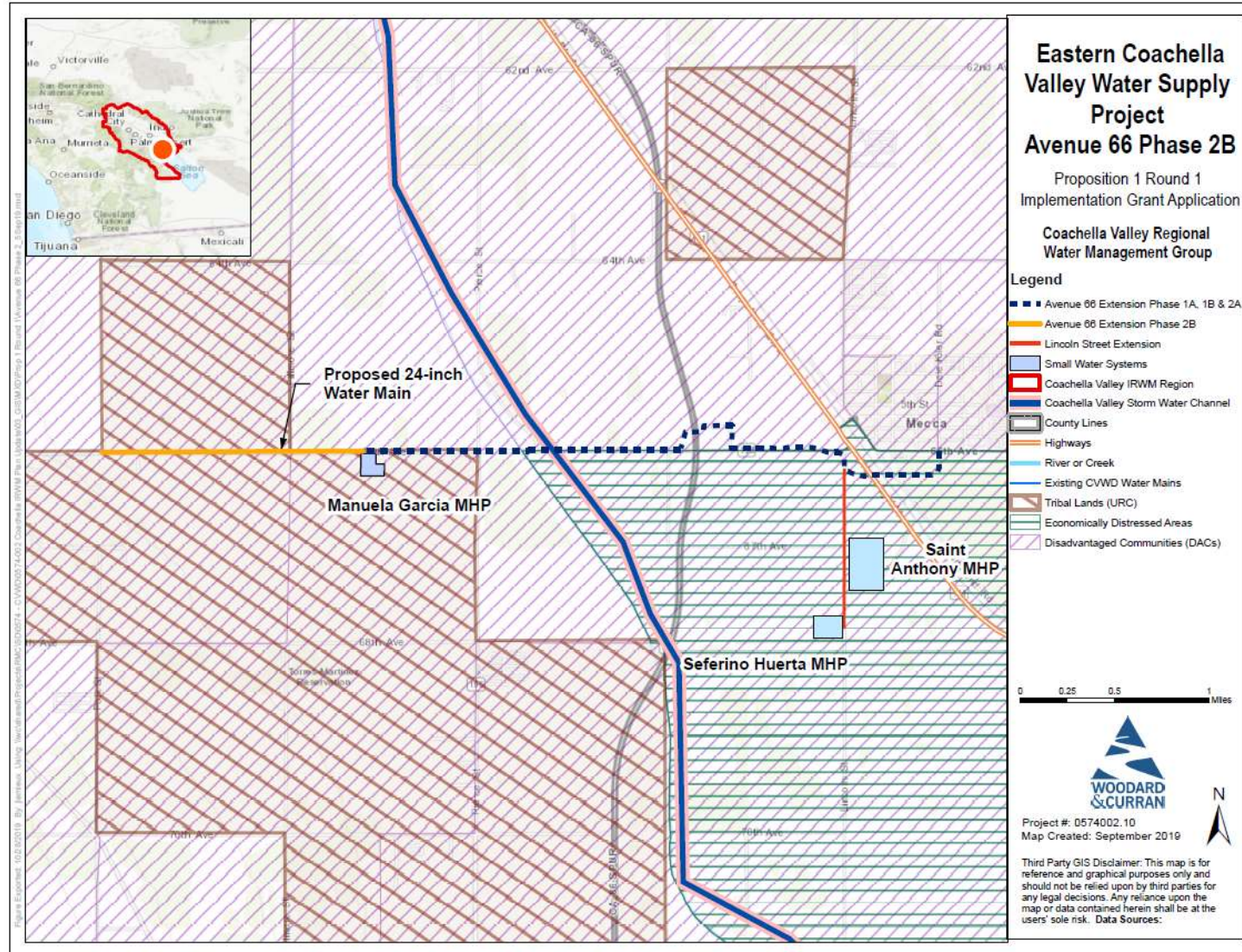
#### **Alternative Data**

No alternative data was used to determine EDAs in the project area.

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<sup>3</sup> Coachella Valley Regional Water Management Group. 2014. *Coachella Valley Disadvantaged Community Outreach Demonstration Project: Final Report*.

Figure 8-4: East Coachella Valley Water Supply Project – Avenue 66 Phase 2B – Proximity to EDAs





#### **Project 4: Groundwater Quality Protection Project Sub Area M2-1**

The *Groundwater Quality Protection Project (GQPP) Sub Area M2-1* is the next phase of MSWD's GQPP, which aims to protect the quality of the groundwater by converting customers from individual septic systems to sewer service. As of 2019, MSWD had converted 7,800 parcels and was scheduled to convert the remaining 3,200 parcels by 2025. The M2-1 portion of the project would eliminate septic tanks that threaten contamination of groundwater supplies, by expansion of MSWD wastewater collection system, and protect hot mineral water which is the economic basis of the community's spa industry. The M2-1 project will connect 318 parcels through a collection system to the MSWD sewer system and abate over 182 onsite septic systems. The wastewater will be conveyed to existing Horton Wastewater Treatment Plant and in the near future the West Valley Water Reclamation Facility, which long term will be able to provide recycled water to MSWD's service area, which includes DAC and EDA area.

Sub Area M2-1 is within a DAC, but not an EDA; however, there is an EDA community located directly south to the area, which would benefit from removal of the M2-1 septic systems, as the nitrogen and bacterial loading to the groundwater basin will be reduced, which benefits both the DAC and EDA communities in MSWD's service area. With this project bringing MSWD's sewer service adjacent to the EDA, there will be a better opportunity to connect the EDA to MSWD's sewer service in the future.

#### ***Percentage of Project Benefits Provided to an EDA***

The project area is DAC, but just misses being a part of the EDA as shown in **Figure 8-5**. Even so, this project will still indirectly benefit the EDA by reducing nitrogen and bacteria levels in the aquifer by improving wastewater treatment and decreasing the community's dependence on septic systems.

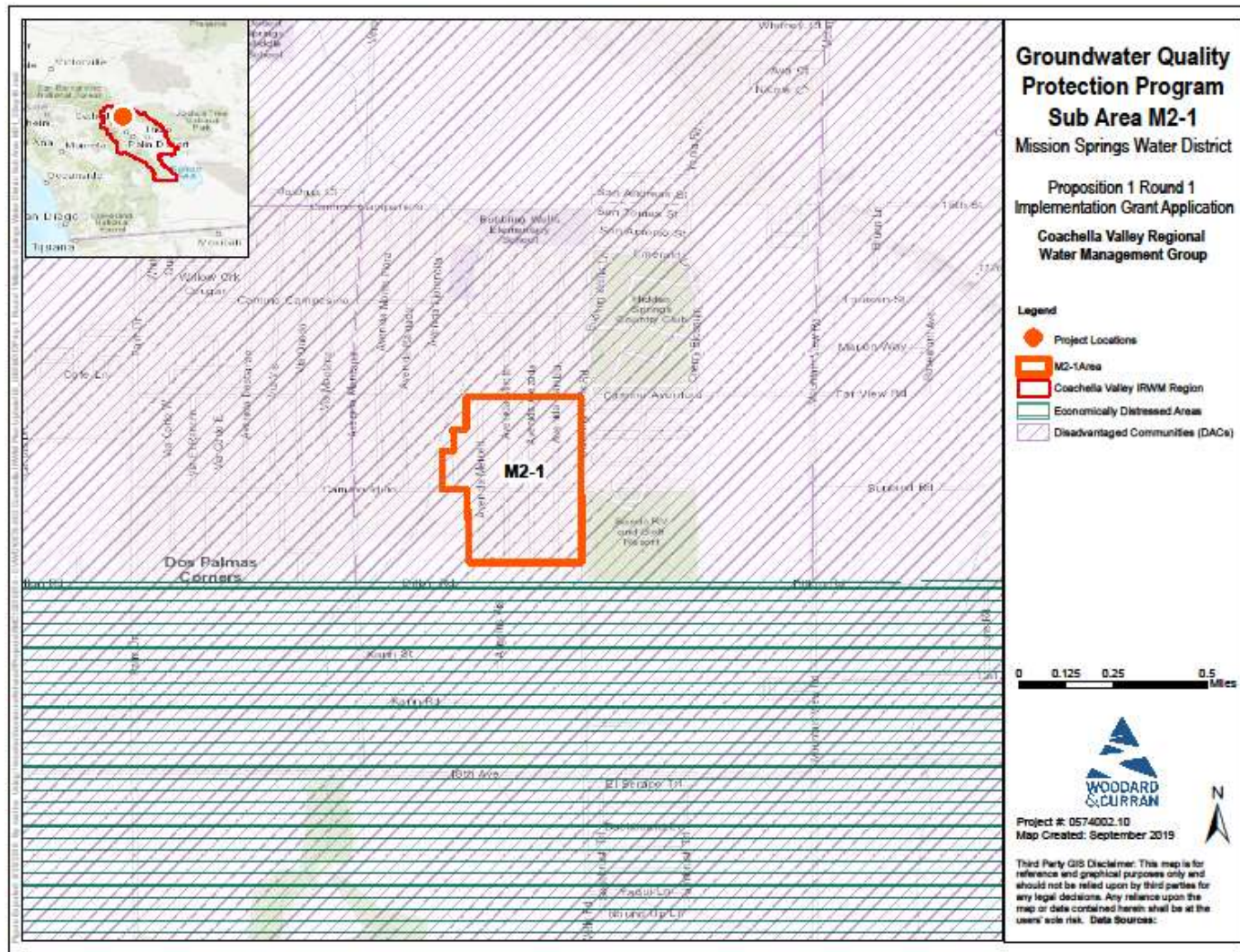
#### ***Letters of Support***

Letters of support for this project are included in Attachment 7.

#### ***Alternative Data***

No alternative data was used to determine EDAs in the project area.

Figure 8-5: Groundwater Quality Protection Project Sub Area M2-1 – Proximity to EDAs





#### **Project 5: East Coachella Valley Septic to Sewer Conversion – Monroe Street**

The Avenue 64 housing subdivision is located on Torres Martinez Tribal land and is home to Tribal residents. Their failing septic system supports 33 tribal homes, a community park, cemetery, and church. A sewer collection system within the subdivision has already been constructed through a joint project with the Tribe, US Indian Health Services (IHS) and the US Environmental Protection Agency (EPA).

As noted in the IHS's 2012 Preliminary Engineering Report (2012 PER), all these homes located in the Avenue 64 housing subdivision are served by individual septic systems. Due to low permeability of the soils within this region, septic systems require large areas for their leach fields, or the soils simply cannot accept a septic system.<sup>4</sup> And with the area being a DAC, many of the homeowners are unable to afford regular pumping for their failing systems. With the septic systems continuously failing, there are public health hazards within the area and contamination of the groundwater. Any groundwater contamination near Avenue 64 is likely following the groundwater gradient to the Salton Sea and is therefore spreading south and southeast from the Avenue 64 housing subdivision and therefore affects downstream EDA areas that rely on the groundwater basin.

By converting the project area from septic to sewer, less nitrogen and bacteria loading will be discharged to the groundwater which will in turn improve the drinking water quality for nearby downstream communities who withdraw groundwater. This project would connect the Tribe's new subdivision to the existing CVWD sewer collection pipeline on Monroe Street north of Avenue 62. By expanding CVWD's sewer collection pipeline it will be easier to continue expanding the CVWD sewer collection system to reach nearby EDA communities in need.

#### ***Percentage of Project Benefits Provided to an EDA***

This project connects a community on the Torres-Martinez Desert Cahuilla Indians Reservation to CVWD's sanitary sewer system. As shown in **Figure 8-6**, the project area is not an EDA as the project is targeted at addressing specific water-related needs of an economically disadvantaged Tribal community. The nearby EDA areas will indirectly benefit from decreased contamination of the groundwater basin.

#### ***Letters of Support***

Letters of support for this project are included in Attachment 7.

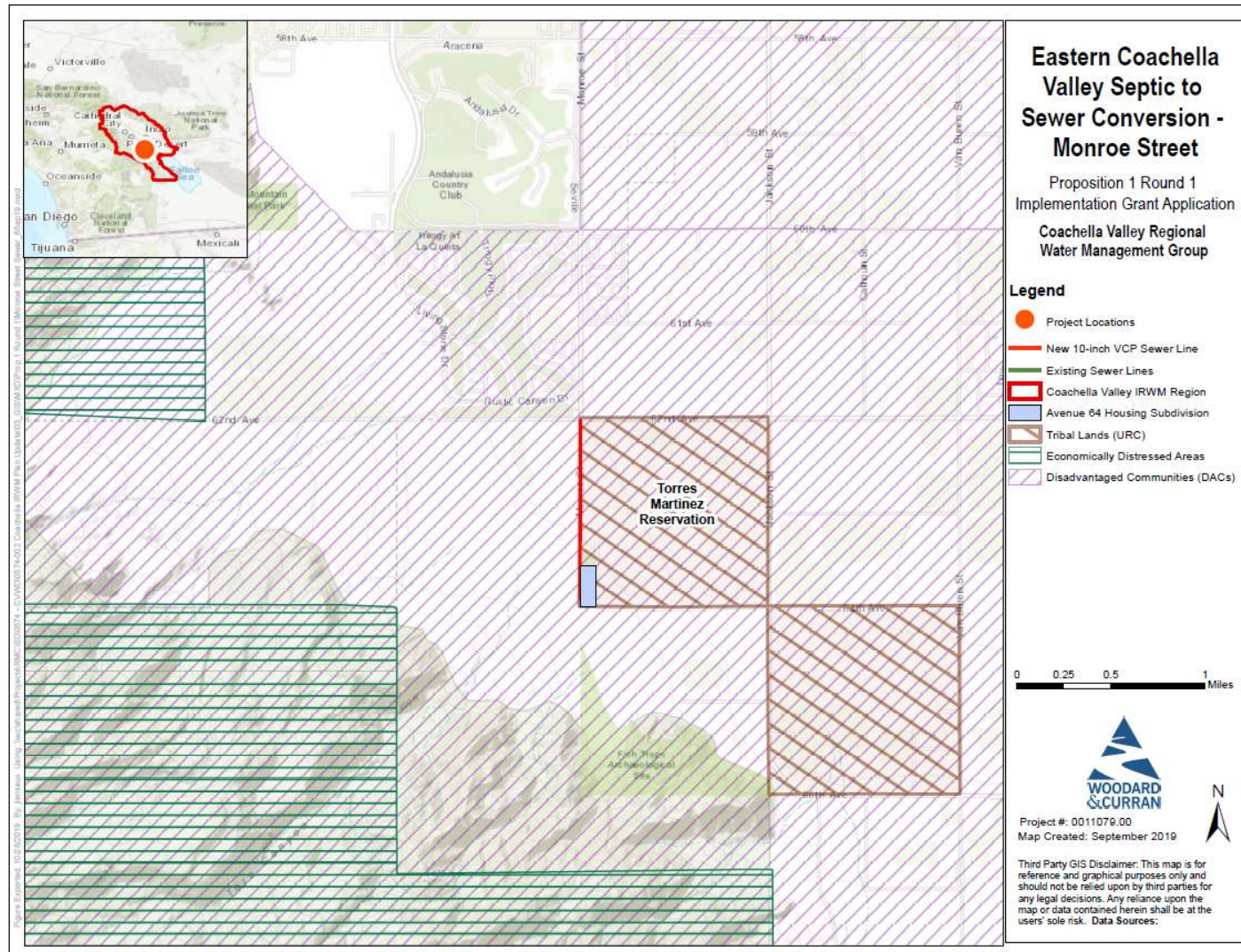
#### ***Alternative Data***

No alternative data was used to determine EDAs in the project area.

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<sup>4</sup> Indian Health Services. 2012. *Preliminary Engineering Report for the Torres-Martinez Desert Cahuilla Indians: CVWD Sewer Main Extension to Avenue 64 Housing Subdivision*.

Figure 8-6: East Coachella Valley Septic to Sewer Conversions – Monroe Street – Proximity to EDAs





#### **Project 6: Non-Potable Water System – Hovley Lane East**

The *Non-Potable Water System – Hovley Lane East* project will supply non-potable water (NPW) to existing and future customers through CVWD's low and high pressure NPW delivery systems. This project will construct additional high-pressure zone piping to connect additional customers, including the Oasis Country Club, who currently irrigates with groundwater. Currently, there is no incentive to switch from the lower cost of pumping groundwater to using NPW. With the reduction of groundwater pumping, less additional water needs to be imported for groundwater recharge purposes. Expanding NPW services and reducing groundwater replenishment will keep potable water costs low throughout the region, which benefits DACs and EDAs.

Even though this project only benefits golf courses, these facilities are still using the same groundwater source as nearby DACs and EDAs. By decreasing the amount of groundwater being pumped for outdoor irrigation, the region will be able to minimize increased water costs for the residents in need. Maintaining future water affordability addresses one of the main water-related issues faced by DAC and EDA communities.

#### ***Percentage of Project Benefits Provided to an EDA***

The project area is not located within an EDA but will reduce the amount of imported water required for groundwater replenishment, which will help keep potable water costs low throughout the region, including for nearby DACs and EDAs. As shown in **Figure 8-7**, the majority of the CVRWMG region is classified as an EDA and efficient use of water supplies therefore ultimately will also indirectly benefit EDAs.

#### ***Letters of Support***

Letters of support for this project are included in Attachment 7.

#### ***Alternative Data***

No alternative data was used to determine EDAs in the project area.

Figure 8-7: Non-Potable Water System – Hovley Lane East Project – Proximity to EDAs

