Coachella Valley Regional Urban Water Management Plan Comments Received

Number	Entity	Comment	Response
1	ACWA	Page 2-4 Section 2.2.2 Agua Caliente Water Authority Draft RUWMP states, The Agua Caliente Water Authority is a branch of Tribal Government that regulates the Tribe's groundwater and surface water. The Draft UWMP's description of the Agua Caliente Water Authority (ACWA) is vague and fails to address the Tribe as the regulator of groundwater resources on its tribal land within the Indio Subbasin. Considering the UWMP's reliance on groundwater as a source of supply and the amount of groundwater resources managed and regulated by ACWA, a more accurate statement would be: "The Agua Caliente Band of Cahuilla Indians protects and preserves the Tribe's groundwater to the maximum extent permitted under Tribal law, and any federal law that may be applicable, through the Agua Caliente Water Authority (ACWA). ACWA controls and manages the proper use of the Tribe's groundwater by administering well permits, monitoring and managing groundwater levels and groundwater quality, and administering groundwater production fees on producers of the Tribe's groundwater."	Updated description to The Agua Caliente Band of Cahuilla Indians has established the Agua Caliente Water Authority (ACWA) to manage and regulate the Tribe's groundwater. ACWA has established a system of permits and fees and engages in monitoring activities.
2A	ACWA	Page 3-2, Section 3.1.1 Basin Description Draft RUWMP states, The subbasins, with their groundwater storage reservoirs, are defined without regard to water quantity or quality. They delineate areas underlain by formations which readily yield the stored water through water wells and offer natural reservoirs for the regulation of water supplies. The basis of the Draft UWMP to meet both the average and 5-year drought water supply requirement relies on the unsupported assumption that groundwater subbasins provide an unlimited supply of groundwater. Subsequent sections 3.1.1.1 through 3.1.1.5 describe the groundwater subbasins but do not address available capacity, usable storage, water level trends or other hydrogeologic indicators that either quantify available resources in each subbasin or discuss their status. The Draft UWMP should provide adequate information that describes whether these basins are in surplus or overdraft and whether they can be operated within their safe yield during various hydrologic conditions.	Groundwater supply reliability is discussed in Chapter 3, Section 4.6, 5.6, 6.6, 7.6, 8.6, and 9.6. The basins are managed in accordance with existing water management plans designed to ensure sustainability. In section 1.1, added description of how Regional UWMP is coordinated with other planning efforts. In section 3.1.3, added description of how basins have been managed under Water Management Plans that have been approved by the California Department of Water Resources (DWR) as Alternatives to a Groundwater Sustainability Plan to meet the sustainability goals of the Sustainable Groundwater Management Act (SGMA).
2B	ACWA	Page 3-2, Section 3.1.1 Basin Description Based on the information provided in Chapter 3 and the statements in the later sections of the report regarding available supply, no technical basis has been provided in the text of the Draft UWMP to suggest overdraft will not occur in the future.	See response to comment 2A
3	ACWA	Chapter 3 The UWMP Guidebook for 2020 states that all Suppliers must: identify existing and planned sources of water; quantify these supplies over five-year increments through 2040; describe, in detail, anticipated availability under normal, single dry, five-year droughts, and any other water year conditions described in the DRA; describe the management of each supply in correlation with other identified supplies; and consider information pertinent to the reliability analysis, including climate change effects. (UWMP Guidebook 2020, Section 6.1.1). This section of the report should therefore quantify the total annual water supply based on all sources of water available to the purveyors, including: Groundwater, Imported Water, Local Surface Water, and Recycled Water, including reliability factors. These sources of water, and natural inflow to the subbasin, should then be used to estimate annual sustainable yield based on variable hydrologic conditions. Compilation of these data will therefore provide a basis for suggesting that water supply will meet both annual and 5-year drought requirements.	Chapter 3 discusses regional water sources. Existing and planned sources of water are quantified in each supplier-specific subsequent chapter.
4	ACWA	Page 3-6, Section 3.1.2 Groundwater Management As discussed above in comments to page 2-4, Section 2.2.2, ACWA is monitoring and managing the Tribe's groundwater resources in the West Whitewater Management Area through the issuance of pumping permits, production fees, and monitoring activities.	See response to comment 1

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5	ACWA	Page 3-14, Section 3.2.2.2 Reliability Draft RUWMP states, CVWD and DWA are using the estimated long-term average allocation to be 58 percent for existing conditions through 2039, and 52 percent for future conditions beginning in 2040. The text preceding this statement is not clear if historical deliveries were used to determine the 58% SWP reliability factor in the 2019 DCR. Additionally, the text should be specific to how temperature and rainfall patterns are expected to change due to climate change to support the reduced reliability factor from 58% to 52% in 2040. The text should determine the reduction due to shifting rainfall patterns vs. risks to SWP supplies as described in Section 3.2.2.8.	This plan is incorporating the analysis included in DWR's 2019 Delivery Capability Report. As clarified in the plan (Section 3.2.2.2) the Indio Subbasin and Mission Creek Alternative Plan Updates are looking at a range of scenarios, including recent trends in delivery reliability and climate change assumptions, to ensure reliable water supplies for current and projected future demands and sustainable basin management.
6	ACWA	Page 4-11, Section 4.4.1.1 Demands Not Served by the Urban Water System The text focuses on the East Valley and CVWD. The ACWA regulates groundwater resources on Reservation lands that currently serve non-municipal uses. A discussion should be included in the text regarding the regulation of water use by ACWA on of Tribal lands within the West Whitewater Management Area.	Header changed to Demands not Served by CVWD Urban Water System to clarify that this section only refers to non-potable demands served by CVWD through systems other than the CVWD urban system.
7	ACWA	Page 4-17, Section 4.4.4 Climate Change Considerations It is not clear from the wording of the paragraph whether climate change is included as a variable in the future demand projections. While climate change in the SWP service area suggests a decrease in imported water deliveries from 58% to 52% (Section 3.2.2.2), this section should more succinctly address whether downscaling of global circulation models, or climate models developed for the Colorado River Basin, may be used to assess impacts to future demand.	Climate change is addressed in section 3.6 and in each of the agency chapters. Additional clarification is being added to page 3-20 that impact of climate change on supplies was considered.
8	ACWA	Page 4-34, Section 4.7.4 Drought Risk Assessment Draft RUWMP states, The results of the DRA are summarized in Table 4-28. The response to the requirement for a Drought Risk Assessment should be described in the text of this section rather than directing the reader to the table. The reporting requirement should be explained, and the results of the DRA should be interpreted, including discussion of how the DRA may impact management activities. Review of Table 4-28 indicates that there is no response to a five-year drought other than "Use Reduction and Supply Augmentation" that results in 0% Use reduction (i.e. no conservation). This suggests that the five-year drought plan relies only on Supply Augmentation that results from additional groundwater pumping. The Water Shortage Contingency Plan (WSCP) identified in Section 4.8 should be introduced before Section 4.7 and its recommendations clearly stated in this section of the Draft UWMP. The text should also state that there are no specific demand reduction requirements during extended drought conditions other than demand measurement measures in Section 4.8.	DWR recommends the opposite order. See Guidebook sections 7 and 8. No changes are being made.
9	ACWA	Similarly provide additional text in Sections 5.7.3, 6.7.3, 7.7.3, 8.7.3, and 9.7.3 discussing reliance on additional pumping to meet 5-year drought requirements.	The following text has been added to 4.7.4, 5.7.3, 6.7.3, 7.7.3, 8.7.3 and 9.7.3: The data and methodologies used to identify a potential shortage are described in the Water Shortage Contingency Plan. Based on the reliability analysis in Section [4.7, 5.7, 6.7, 7.7, 8.7, 9.7], the supply of groundwater is fully reliable under a five-year drought, including consideration of historic droughts in the Coachella Valley and potential impacts of climate change.
10	Leadership Counsel for Justice and Accountability	Public Outreach to disadvantaged communities in the Eastern Coachella Valley While we commend CVWD and other regional members on thinking creatively about how to conduct public outreach in the midst of a pandemic, we are concerned that public outreach efforts may not have reached some of the most vulnerable communities in the region, disadvantaged communities in the Eastern Coachella Valley. Many of the outreach efforts that were listed in both the Draft UWMP and Draft DWSCP relied heavily on technology. The Eastern Coachella Valley has very limited broadband infrastructure and residents struggle with access to technology. To ensure these plans reflect these communities' concerns, we suggest CVWD conduct in-person outreach in the Easter Coachella Valley.	We recognize the importance of in-person outreach and consultation, however, due to the pandemic all meetings were held virtually in compliance with Governor Newsom's Brown Act Executive Orders to ensure the safety of the public, staff and consultants.
11	Leadership Counsel for Justice and Accountability	Climate Change Analysis is Inadequate While we acknowledge that a climate change analysis is not required, given the impending impacts of climate change, it is critical CVWD take into account the impact this will have on short and long term water supplies. Having a high priority allocation is not sufficient evidence that drought nor climate change will not impact water supplies. Additionally, despite projected increases in water supply demands within the Draft UWMP, CVWD fails to take into account the impact of drought and climate change. In order to ensure climate change is accurately accounted for, CVWD should consider doing a more extensive climate change analysis.	Climate change is addressed in section 3.6 and in each of the agency chapters. Additional clarification is being added to page 3-20 that impact of climate change on supplies was considered.

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12	Leadership Counsel for Justice and Accountability	Consideration of water supply needs of unincorporated and low-income communities As Draft UWMP and Draft DWSCP are currently written, it is unclear how the water supply needs of unincorporated and low-income communities were taken into account. Several mobile home parks that are dependent on degraded groundwater quality, have expressed the need to consolidate into the CVWD water system. While CVWD has active consolidation projects in the Eastern Coachella Valley, it is unclear how these water supply needs and those of communities who would like to consolidate were taken into consideration in the water supply analysis presented. Given the widespread need for water infrastructure in the Eastern Coachella Valley, CVWD should consider the water supply needs of these communities and actively incorporate consolidation of these communities in their short and long term water management plans.	Demands for 2025-2045 within CVWD's jurisdictional area include urban demands for areas that may be consolidated or connected to CVWD's urban water system in the future. See Section 4.4.1.3 and Table 4-7.
13A	Leadership Counsel for Justice and Accountability	Insufficient Water Shortage Contingency Plan As it is currently written, we are concerned that the Draft DWSCP does not proactively plan for impending drought. To begin, as was stated earlier, CVWD does not believe there will be an impact to their water supply because of their high priority allocation in the Colorado River. High priority allocation does not guarantee there will never be water supply shortages or curtailments. In the past decade we have seen water supplies deplete further and further because of the impact of climate change. CVWD cannot plan under the assumption that depletion in the Colorado River will never impact their water supplies.	The Agencies are considering climate change in their planning efforts.
13B	Leadership Counsel for Justice and Accountability	Second, Water shortage levels and water response actions appear to only apply to municipal users. We commend CVWD for their efforts to reduce water supply waste on the municipal level, however CVWD must also be proactive in incentivizing reduction of water use in the agricultural, irrigation, and golf industries. These industries are far higher consumers of water use than municipal users, and CVWD needs to ensure they are also reducing water supply use during drought.	The WSCP applies to urban water users only and not agricultural, irrigation, and golf uses supplied by private wells or untreated Colorado River water. During the last drought many non-urban users were regulated directly by the State Water Resources Control Board.
13C	Leadership Counsel for Justice and Accountability	Last, it is widely known the Eastern Coachella Valley is plagued by unsafe groundwater quality. Groundwater quality can often further degrade during drought when groundwater levels drop. To protect residents dependent on groundwater during drought, CVWD should consider developing an emergency consolidation plan for communities whose groundwater quality is degrading during drought.	CVWD and other agencies continue to monitor groundwater levels and quality throughout the Coachella Valley.
14	Coachella Valley Waterkeeper	THE UWMP DOES NOT ADEQUATELY ADDRESS THE EFFECTS OF CLIMATE CHANGE ON THE REGION'S WATER SUPPLY California Water Code Section 10631(b) requires urban water suppliers to consider the effect of climate change in their UWMPs. Section 10635(b)(1) mandates a detailed discussion of anticipated water supply under "more frequent and severe periods of drought," and Section 10635(b)(4) requires "[c]onsiderations of the historical drought hydrology, plausible changes on projected supplies and demands under climate change conditions. The California Department of Water Resources ("DWR") Climate Change Appendix (the "CCA") demonstrates the potential effects of climate change on California's water supply and use. The CCA notes that climate change may cause decreased water availability and increased water use throughout the state. Because climate change poses a threat to California's water security, it is crucial that the UWMP layout preparedness strategies to mitigate the effects of climate change. The draft UWMP uses a 5% State Water Project ("SWP") allocation as the worst-case scenario despite the SWP allocation dropping to 0% in 2014. The UWMP considers the 2014 SWP allocations unusual and having a low probability of frequent occurrence. This standard is in tension with subsequent portions of the UWMP, notably section 3.6, "Climate Change." Section 3.6 notes that the Colorado River Hydrologic Region will experience "more frequent and longer droughts." Given that the Coachella Valley is in the Colorado River Hydrologic Region, there should be higher consideration of the effects of drought. The notion that the 2014 drought is a worst-case scenario that is unlikely to reoccur conflicts with the vast weight of scientific evidence, DWR guidance, and contentions made elsewhere in the UWMP that as the climate changes, droughts in Southern California will become harsher and more frequent. The UWMP does not discuss the anticipated water supply in the case of more frequent and severe periods of drought than that of 2012-2016, nor does it attempt to quantify these likely changes. The six supplemental Water Shortage Contingency Plans ("WSCPs") also do not adequately plan for potential drought conditions and increased water use associated with climate change. The WSCPs state that drought conditions will not impact Coachella Valley Water District ("CVWD")'s Colorado River water supply because the agencies have high priority allocations. This statement overlooks the 2018 Coachella Valley Integrated Regional Water Management & Stormwater Resource Plan, which states that the region's Colorado River water supply may be negatively impacted by up to a 20% decrease in Colorado River flow. While the WSCPs note that "Coachella Valley Groundwater Basin is a large basin which provides a buffer during dry periods," they do not discuss the effects of groundwater overdraft or lay out a plan to mitigate the impacts of groundwater overdraft in the case of a severe drought lasting multiple years. Regional water agencies recharge the basin with imported water, so reductions in imported water availability directly affect the health of the aquifer. The current plan assumes the basin may be sufficiently recharged during years with high SWP and Colorado River allocations. Rather than assume there will be ample imported water to relieve overdraft, the WSCPs should consider the effects of severe, multi-year droughts on not only water use and overdraft but on the decreased potential to replenish the aquifer with imported water.	Climate change is addressed in section 3.6 and in each of the agency chapters. Projected reliability at 58% provided in the DWR Delivery Capability Report for State Water Project supplies is an average that incorporates a range of hydrologic conditions. As clarified in the plan (Section 3.2.2.2) the Indio Subbasin and Mission Creek Alternative Plan Updates are looking at a range of scenarios, including recent trends in delivery reliability and climate change, to ensure reliable water supplies and sustainable basin management, for current and projected future demands. Additional clarification is being added to page 3-20 that impact of climate change on supplies was considered. Additionally, despite a preliminary allocation of 0%, the final allocation for 2014 was 5%, as noted on page 3-15.

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15A	Coachella Valley Waterkeeper	THE UWMP DOES NOT ADEQUATELY DETAIL PLANS FOR OPTIMIZING THE USE OF RECYCLED WATER California Water Code Section 10633(g) requires urban water suppliers to create "[a] plan for optimizing the use of recycled water in the supplier's service area…and to overcome any obstacles to achieving that increased use." Given the region's arid environment and considering the effects of climate change, the use of recycled water in the Coachella Valley is an essential aspect of water security which must be analyzed in the UWMP. The following sections do not adequately address the future of recycled water in the Coachella Valley: Section 4.6.2.5 of the UWMP does not sufficiently describe how **CVWD** will facilitate the increased use of treated wastewater. The UWMP describes current and past uses of recycled water, but not contemplate plans for expansion. Plans for the future use of recycled water should also account for the shortfalls of previous plans. The 2020 actual use fell short of the 2015 projection in both Landscape Irrigation and Golf Course Irrigation use types. Additionally, the 2015 actual use fell short of the 2010 projection in both Landscape Irrigation and Golf Course Irrigation use types. The UWMP does not address the reasons for these shortfalls or any plans to ensure future recycled water use meets or exceeds the projections. While the UWMP lists incentives designed to increase recycled water use, these incentives have not been improved upon from the 2015 UWMP in which they were unsuccessful at meeting the projected levels. Given that the region is only expected to face harsher and more frequent dry periods, these incentives should be improved upon if they are to meet the updated recycled water use projections.	The Urban Water Management Planning Act does not require agencies to include information detailing plans for the expanded use of recycled water. CVWD has developed a Non-Potable Master Plan that is intended to guide future development of recycled water. Additional recycled water development is also considered in the Indio Subbasin and Mission Creek Subbasin Alternative Plans.
15B		Section 5.6.2.5 of the UWMP does not adequately describe how the **Coachella Water Authority ("CWA")** will facilitate the increased use of treated wastewater. The UWMP states that "the City does not have infrastructure in place to recycle water" and "does not have recycled water use within its service area." The UWMP offers a vague statement that "the City plans to use recycled water in some capacity in the future," but fails to provide a plan for doing so. The City of Coachella's 2015 UWMP, section 6.5.3, stated that the City would evaluate the future use of recycled water based on the CVRWMG Recycled Water Feasibility Study. This 2020 UWMP does not mention the results of this study or how it impacts the potential uses of recycled water.	See response to comment 15A
15C		Section 6.6.2.5 of the UWMP does not adequately describe how the **Desert Water Agency ("DWA")** will facilitate the increased use of treated wastewater. The UWMP states, "there is limited potential for expanding recycled water use within DWA's service area." The UWMP does not describe how DWA will overcome obstacles to achieving increased use of recycled water. DWA uses water from two non-potable, shallow groundwater wells to supplement recycled water demands in the summer months. While the pumping of non-potable water supplements recycled water demand in summer months and may reduce the pumping of potable water, it still constitutes groundwater extraction. As a result, these two non-potable, shallow wells may contribute to groundwater overdraft. The UWMP should note whether or not these sites are susceptible to overdraft and any current or planned groundwater replenishment at these sites. Additionally, shallower wells are subject to increased variability and fluctuation of water availability and may be more susceptible to drought conditions than deeper wells. The UWMP should acknowledge this lack of reliability, and subsequently, detail plans for how the water pumped from these wells would be supplemented should there be a severe drought.	See response to comment 15A
15D		Section 9.6.2.5 of the UWMP does not adequately describe how the **Myoma Dunes Mutual Water Company ("MDMWC")** will facilitate the increased use of treated wastewater. The UWMP states that "MDMWC does not have current or planned uses for recycled water primarily due to the lack of wastewater treatment capabilities within the service area. Costs to install wastewater treatment facilities or a dual recycled water distribution system are likely prohibitive at this time." The UWMP does not describe how DWA will overcome any such obstacles to achieving increased use of recycled water. The UWMP also does not specify whether or not the costs are prohibited but that they are "likely" prohibitive.	See response to comment 15A
15E		Additionally, the six WSCPs do not discuss demand reduction actions for commercial water parks. The use of these facilities is likely to increase with more of such parks under consideration. Given the high water use of such facilities and the arid environment of the Coachella Valley, plans should be in place to manage water for these users during instances of drought.	Commercial water parks that are part of the urban water system are subject to the provisions of the Water Shortage Contingency Plan. During the last drought, the State Water Resources Control Board regulated entities that were not under the jurisdiction of public water agencies.

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16	Coachella Valley Waterkeeper	THE UWMP CONTAINS OVERLY BROAD AND INACCURATE INFORMATION IN SEVERAL TABLES While Waterkeeper understands that not all projections can be quantified, it is pertinent to the goals of the UWMP to quantify predictions, when possible, even if in a range. Multiple tables note that "[t]he RUWMP participating agencies collaborate on groundwater management plans for long-term sustainability. During a normal year, single-dry year, or five-dry year period, the agencies could produce additional groundwater if demands exceeded the estimates shown here." Problematically, the UWMP does not list how or to what extent the agencies could produce additional groundwater if demands exceed estimates. Given the proximity of the six water agencies, it is likely that a single-dry year or five-dry year period would affect several or all of the water agencies. Should multiple or all regional water agencies experience water shortages, it may not be possible to produce additional groundwater by shifting supplies from one agency to another. Without quantifiable projections, there is no way of knowing whether it is possible to produce enough additional groundwater to meet the needs of multi-year drought periods. Table 4-5 states that "[f]uture commercial water use is expected to be lower in response to CalGreen requirements." Again, this statement does not quantify how much CalGreen requirements are expected to lower commercial water use, nor does it consider potential expansion of the commercial sector, notably the multiple surf parks planned for development in the Coachella Valley region in the next five years. Finally, Table 5-3 appears to contain a typographical error. The CWA's projected population for 2040 should perhaps be 100,248, not 10,248.	Groundwater supply reliability is discussed in Chapter 3, Section 4.6, 5.6, 6.6, 7.6, 8.6, and 9.6. The basins are managed in accordance with existing Water Management Plans, approved by DWR as Alternatives to Groundwater Sustainability Plans, designed to ensure reliable water supplies for current and projected future demands and sustainable basin management. In section 1.1, added description of how Regional UWMP is coordinated with other planning efforts. Table 5-3 has been updated to correct typographical error.