

Imperial IRWMP Scoping and Review of CDWR Resources Management Strategies

Improve Water Quality

1.1.1 *Drinking Water Treatment and Distribution*

1.1.1.1 Findings

- When applying for IRWMP grant monies to the extent possible identify common needs and developing regional priorities.
 - Define opportunities to interconnect the drinking water treatment systems to reduce the risks of catastrophic supply interruption.
 - Address raw and treated water storage needs and opportunities.
 - Encourage and support multiple connections to potable and new water delivery and storage facilities from IID and/or other source for municipal water purveyors.
- Consider opportunities to consolidate drinking water treatment facilities.
- Imperial Region disadvantaged communities (DACs) need technical, management and financial support to design projects, so they are ready to proceed to compete for state and/or federal funds.
- The Imperial IRWMP should be used to inventory project-level investments to:
 - Address public health or environmental emergencies.
 - Repair, rehabilitate, or replace treatment, collection, and/or distribution systems.
 - Attain compliance with applicable state and/or federal regulatory requirements.
 - Meet applicable local service levels and future requirements consistent with the general plans.
- Use the Imperial IRWMP to match projects to available funds.
- Establish how local rates and assessments should be used to meet local matching fund requirements for state and/or federal grants.
- Develop the region's political capital to minimize local competition, establish regional priorities, and define integration opportunities and approaches for generating local funds to leverage state and federal monies and invest in needed infrastructure.

1.1.2 *Matching Quality to Use*

1.1.2.1 Findings

- Evaluate and support the use and development of impaired quality water where cost-effective and where such uses could provide economic benefits to the Imperial Region.
- Conduct pilot and demonstration projects that demonstrate economic use of poor quality water to expand the water supply portfolio and support economic growth.

- Treat and recycle municipal wastewater to a level of quality that is legally acceptable for beneficial use in lieu of the region's Colorado River supply.
- Extend the available supply by using recycled, saline and brackish water to produce algae, manage dust and particulates, and provide for other uses.

1.1.3 Salt and Salinity Management RMS

1.1.3.1 Findings

- Salt and salinity management are essential in the Imperial Region due to the salt content in the Colorado River water (1 ton of salt/acre-foot of imported water).
- Salt and salinity management are integrated with the other management strategies or as part of existing practices and programs, and no new activities or actions have been identified.
 - In the IID Service area the growers incorporate leaching, subsurface tile drainage, soil amendments and other salinity management practices as a part of their regular farming activity.
 - Existing programs, both private and public, support growers in managing the salt that comes in with Colorado River water supplies. The Imperial region is not recommending additional new programs or projects related to salt and salinity management as part of the IRWMP.
 - QSA and Related Agreements include mitigation flow for the Salton Sea through 2017.
 - Desalination resource management strategy includes a clause addressing removal of salts from drain water, brackish groundwater and/or other water sources and anticipates requirements for brine disposal and other water sources.
 - Stakeholders have proposed desalinization projects as part of the IRWMP implementation.
 - Recycled Municipal Water resource management strategy includes projects and programs that could change drain flows or potentially affect salinity; decreased drain flow or increased salinity may require mitigation for identified impacts.
- Regional stakeholders should actively engage in efforts to address the Salton Sea to realize benefits and avoid impacts to the region.

1.1.4 Pollution Prevention

1.1.4.1 Findings

- Existing local, state and federal laws, ordinances, regulations and statutes are sufficient to control the sources of regulated contaminants within the Imperial region.

- No additional pollution prevention actions were identified during initial Imperial IRWMP scoping or project definition and no further measures are anticipated for inclusion as part of the plan.
- The Water Forum and ongoing planning efforts should be used to identify, integrate and coordinate existing non-regulatory programs where feasible.
- Imperial County Farm Bureau Total Maximum Daily Load Program to meet silt discharge and other requirements consistent with the Regional Water Quality Control Board's Colorado River Basin Plan is being voluntarily and successfully carried out by Imperial Valley growers, and no program expansion or changes are anticipated as part of the Imperial IRWMP.
- IID's Drain Water Quality Improvement Program provides for periodic monitoring of water quality in major IID drains, both within and outside of IID's service area, for several constituents of concern. Resulting data are reported to the Regional Water Quality Control Board.
- IID's Vegetation Management Plan supports the enhancement of water quality within the IID drainshed by reducing sediment loads in the drainage conveyance channels.
- Coordinate with New River Improvement Project efforts to remediate contaminated water and improve water quality flowing across the Mexican border into the United States via the New River (see Ecosystem Enhancement Restoration resources management strategy).
- Coordinate with Citizen's Congressional Task force on the New River to continue to build and maintain wetlands where funds allow.

The Water Forum also supports the following water quality planning principles. Utilities must be well managed locally to ensure long-term sustainability of collection, treatment, and distribution systems. The second line of defense in ensuring the Imperial Region enjoys the benefits of clean and safe water is to ensure that local water and wastewater utilities are well maintained and operated with sufficient local support. Specifically, the Water Forum supports:

- Strong professional staff that are viewed as advocates for clean and safe water in the community and on the state and federal levels. In addition, utilities must have employee development and training programs that ensure that utility staff has the skills needed to manage, operate, and maintain the utility using BMPs.
- Full cost-of-service pricing systems that encourage local communities to establish rates that reflect, to the maximum extent practicable, the system's true life-cycle costs, including debt service, and that can support long-term management needs.
- Sustainable management approaches, including asset management and environmental management systems that proactively ensure long-term viability of each component of the system while simultaneously ensuring compliance with local, state, and federal environmental regulations.

- A culture of constant innovation and research into new technologies and management approaches that support BMPs—including conservation, efficiency, and reuse—and a system to ensure transparency and public participation so the utility remains accountable to ratepayers and the general public.

1.1.4.2 Planning Principles

The Water Forum recognizes that even if local utilities do all of the above and are managing their systems using best management practices, federal and state assistance in financing infrastructure will continue to be essential for many Imperial Region communities. In addition, significant and continuing state and federal investment are needed to help Imperial Region agencies meet their obligations under the Clean Water Act and the Safe Drinking Water Act. Specifically, the Water Forum supports the following:

- Reauthorization and funding for the Clean Water and Safe Drinking Water State Revolving Fund (SRF) Programs with appropriations that reflect financing needed to meet requirements.
- Improve administration of SRFs to (1) streamline the application process; (2) provide increased flexibility to the state to determine project eligibility and environmental compliance standards with public input; (3) encourage innovative partnerships that bring diverse stakeholders together for more effective broad-based solutions; and (4) reduce paperwork burdens on communities.
- Flexible forms of need-based financing to assist communities that do not have the rate base to support conventional or SRF loan financing costs, including include extended loan terms, loan forgiveness programs and grants. DAC communities in the Imperial Region are facing costly environmental challenges and expenses to correct existing problems and/or meet regulatory and security requirements. More comprehensive affordability criteria should be developed by the state to use in allocating SRF financing.
- In addition to increased funding for the SRF, assuring infrastructure sustainability will require increased federal support for California to administer clean water programs, including:
 - Support for technical assistance to small communities.
 - Federal investment for research and development of treatment and infrastructure technologies and asset management strategies that improve the life-cycle of drinking water treatment systems.
 - Support for development of a program to educate the public about the benefits and economic importance of water and wastewater infrastructure.

The Water Forum supports strategies that encourage participation by the general public and the business community to ensure clean and safe water for the Imperial Region. Specifically, the Water Forum supports:

- Water suppliers enter into partnerships and cooperative relationships with the business community to develop innovative, cost-effective solutions to infrastructure sustainability.
- Public-private partnership decisions should be made locally based on what local officials determine is most appropriate for preserving and enhancing the water environment.
- Elected officials and non-governmental organizations, including public health organizations, advocacy groups, business associations and other civic organizations, playing a leadership role in highlighting the importance of water infrastructure and continued investment in it.
- A continued commitment public outreach to increase the public's support for investment in infrastructure for a clean, safe water supply.