

## ATTACHMENT 3. IMPERIAL REGION IRWMP PLANNING GRANT WORK PLAN

The Imperial Water Forum (Water Forum) includes a collaborative, multi-stakeholder process to prepare and adopt the Imperial Integrated Regional Water Management Plan (Imperial IRWMP). Per CDWR Guidelines, the work plan for development of the IRWMP consists of two sections: Background and Work Plan. The planning end of the planning period is 2050.

### Background

The section provides a history of the Imperial Region's integrated regional water management and planning process to date and provides the context for the work plan. It includes a brief discussion of previous efforts that relate to development of the Imperial IRWMP. The Imperial Water Forum (Water Forum) has come together to undertake a collaborative, multi-stakeholder process to prepare and adopt the Imperial Integrated Regional Water Management Plan (Imperial IRWMP). The Water Forum is working to identify water resources issues and conflicts, define goals and objectives, review and develop resources management strategies to resolve common issues related to the region's water supply, water quality, environmental stewardship, and flood management. The Imperial IRWMP will also define regional projects and programs; identify and address water supply and quality needs of disadvantaged communities (DACs), address climate change; and will be adopted to provide a roadmap for the region's future. The IRWMP planning horizon is to the year 2047. This document provides background information and outlines the work plan for preparing the Imperial IRWMP.

### Integrated Regional Water Management in the Imperial Region

Imperial Irrigation District (IID) issued a service agreement to fund preparation of an Integrated Water Resources Management Plan (*Draft IID Plan*) that includes supply augmentation and demand management components in December 2008. The IID Board was motivated by the need to identify local and regional supply alternatives to provide water for increased industrial, commercial and municipal water demand. The *Draft IID Plan* defined a suite of project, program, and policy alternatives, along with an implementation plan, that IID could independently carry out to better manage the available Colorado River water supplies. The *Draft IID Plan* incorporates elements of an Integrated Regional Water Management Plan pursuant to the requirements established by the California State Legislature and California Department of Water Resources (CDWR)<sup>1</sup>, but was developed with limited stakeholder involvement and public outreach, and did not fully address the updated state integrated regional water management standards issued in 2010.

In the process of preparing the *Draft IID Plan*, and based on feedback from stakeholders in the community, the IID Board realized that a wider effort was needed to successfully resolve the broader regional water resources issues and conflicts. In March 2009, the IID Board with the support of the

---

<sup>1</sup> Proposition 84 and Proposition 1E Integrated Regional Water Management Guidelines, August 2010.

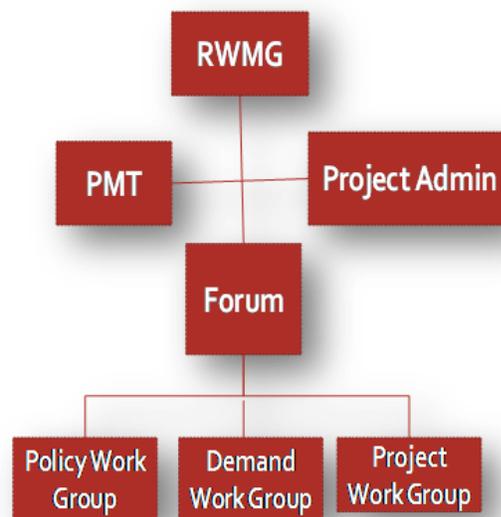
County of Imperial prepared the Imperial IRWMP Region Acceptance Process<sup>2</sup> (RAP) document. The Imperial RAP document was submitted to CDWR In April 2009. In November 2009, CDWR accepted the Imperial Region and encouraged IID, County of Imperial, and the local stakeholders to move forward to develop the Imperial IRWMP. The IID accepted the *Draft IID Plan* on September 29, 2009. In accepting the *Draft IID Plan*, the IID Board stated its intention to work with Imperial County and other stakeholders in the Imperial Region to develop the Water Forum and RWMG. Stakeholder assessments and outreach were conducted during late 2009 and early 2010, and the groundwork was laid over to conduct the public Water Forum kick-off meeting in April 2009.

### The Imperial Water Forum and Regional Water Management Group (RWMG)

IID and County of Imperial, as the primary sponsors of the IRWM planning effort, solicited the participation of the cities, unincorporated communities and a wide array of stakeholder groups within the region. IID is organized under the California Irrigation District Law, and delivers Colorado River water for all agricultural and nearly all municipal, commercial and industrial uses within the Imperial Region. County of Imperial, in addition to its land use authorities, has statutory authority for groundwater resource management in County of Imperial as codified under the County Groundwater Ordinance (Title 9, Division 22).

IID and County of Imperial convened the Imperial Water Forum (Water Forum) and Regional Water Management Group (RWMG), which together provide the management structure, decision process and mechanism for stakeholder and public involvement. *Imperial IRWMP Water Forum and Regional Water Management Group Charter* (Charter) was drafted by a Charter Work Group of the Water Forum and was adopted at the September 9, 2010, Water Forum meeting. The purpose of the Charter is to formalize interactions between the sponsoring agencies (IID, County of Imperial) and the other stakeholders during development of the Imperial IRWMP. The Charter contains sections that define Program Organization and Operation; Administrative Oversight and Technical Support; Decision-making Process, Development, Endorsement and Adoption of the IRWMP; and Values and Principles. The Charter spells out the purpose for the Water Forum, RWMG, Program Management Team (PMT) and workgroups; and defines the membership and roles and responsibilities for these organizational units. Currently there are three work groups include: Policy, Demand Management and Projects.

Figure 1 Water Forum Organization



<sup>2</sup> Imperial IRWMP Regional Acceptance Process, April 2009.

The Water Forum operates by consensus and will provide primary input during development of the Imperial IRWMP. The Water Forum is open to all stakeholder groups and is comprised of designated representatives from public agencies and organized stakeholder groups (e.g., non-governmental organizations). The Charter lists the current stakeholder groups and participants. The list will be updated as new groups are identified and wish to participate. Water Forum membership is inclusive to ensure broad representation and accommodate a diversity of perspectives and participation; and, as stated in the Charter, input from any interested party is welcomed and encouraged. In October 2010, each of the stakeholder groups is expected to adopt a resolution of support; thereby, accepting the Charter, endorsing the IRWMP Mission, Goals and Objectives, and designating representatives to the Water Forum and, as appropriate, to the RWMG.

The purpose of the RWMG is to resolve conflicts and make decisions by majority vote when Water Forum membership cannot attain consensus; that is, to act as the final arbiter of decisions where necessary. The RWMG intent is also to engage the elected officials and other key entities in the process.

Membership includes:

- Five (5) elected representatives of the Imperial Region land use and water management agencies, as follows: one (1) member from the IID Board of Directors and one (1) member of the County of Imperial Board of Supervisors will be appointed by their respective groups, and three (3) elected City Council members of Cities participating in the Water Forum, two (2) of which must be designated as DACs, will be appointed by consensus of the Cities.
- One (1) representative for agricultural water users as appointed by the Imperial Irrigation District Water Conservation Advisory Board
- One (1) representative for industrial/business water users to be appointed by the Imperial Valley Economic Development Corporation,
- One (1) representative community based organizations to represent environmental justice concerns, and
- One (1) representative from the special districts which provide water and wastewater services.

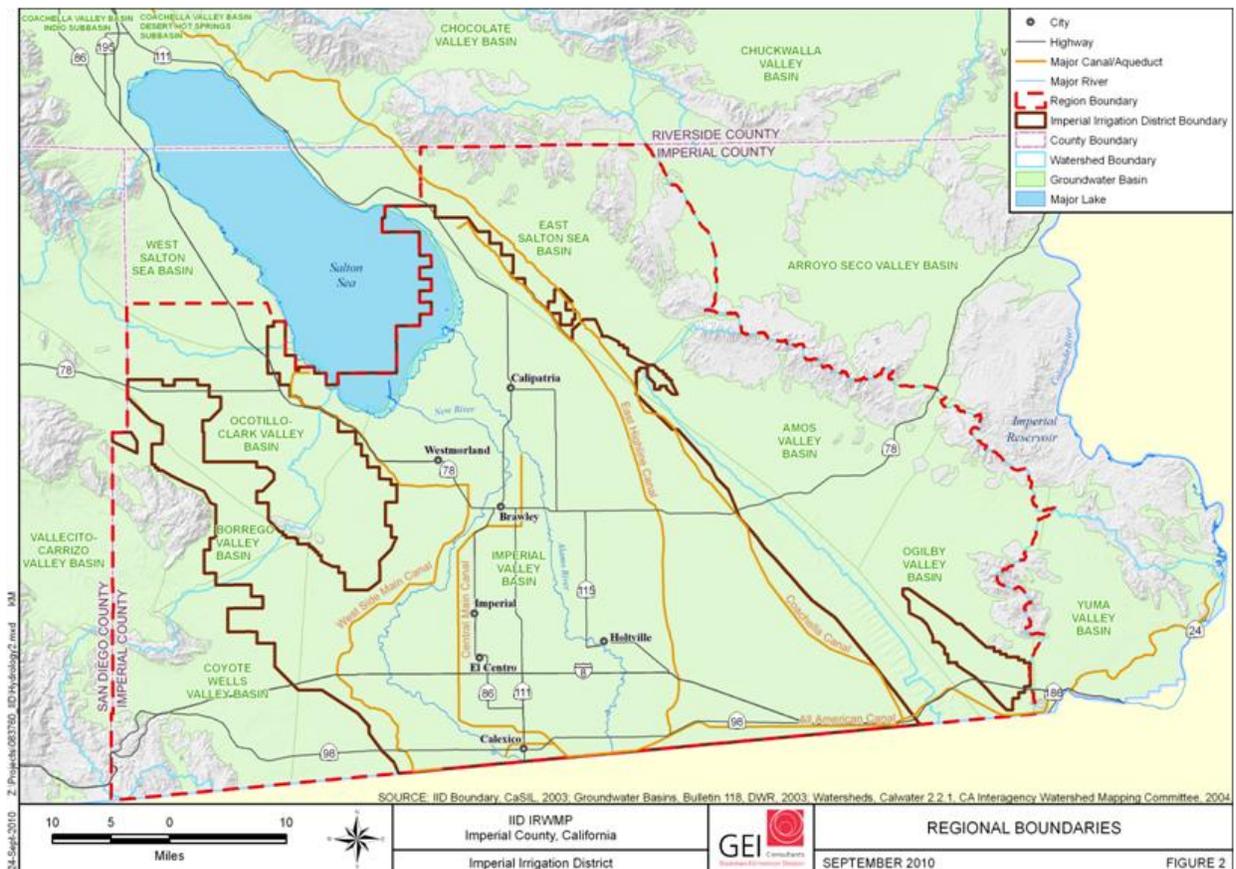
The PMT is to provide effective and efficient coordination of the IRWMP process and logistical support to the Water Forum, RWMG, and work groups. At minimum, the PMT will be comprised of senior staff of IID and County of Imperial, at least one senior staff member of one of the Cities, a CDWR Regional Representative, a Consulting Team Program Manager and a Facilitator. Pursuant to the Charter, IID serves as the contracting entity and administrator for the Water Forum for CDWR grants and consulting.

Work groups will be formed from member agencies in the Water Forum to provide technical resource to address specific issues or assignments from the Water Forum and to provide recommendations and feedback to the Water Forum.

### **The Imperial Region**

Regional boundaries are shown in Figure 2. No changes to the Imperial Region boundaries were required by CDWR during the RAP process. CDWR noted that the Salton Sea concerns are beyond the

scale of a regional solution; therefore, the Salton Sea is not included in the Imperial Region<sup>3</sup>. The Imperial Region is located in Imperial County, to the west of the Colorado River and generally south of the Salton Sea, it is bounded on the south by the Republic of Mexico, on the west by San Diego County and lies completely within CDWR's Colorado River Hydrologic Region; it is also entirely within the State Water Resources Control Board Region 7, Colorado River Basin Region. The basis for selection of the Imperial Region boundaries included both hydrologic (Bulletin 118 groundwater basins, watersheds) and administrative or jurisdictional considerations (the IID/Coachella Valley Water District boundary, the Imperial County / San Diego County boundary, and the U.S./Mexico border). The area is almost exclusively reliant on imported water supplies from the Colorado River.



**Figure 2 Imperial Region**

Groundwater supplies are limited due to low annual recharge rates and poor water quality. Agriculture represents 96% of the water use with municipal, commercial and industrial uses represent 4%.

In 2008, the population of Imperial County was 166,874, with all except for around 20,000 of those persons residing in the Imperial Region. The developed areas include the incorporated cities of Imperial,

<sup>3</sup> [http://www.water.ca.gov/irwm/docs/RegionalsAcceptanceProcess/Individual\\_RAP\\_Summaries/ImperialValley\\_RAPSummary.doc2](http://www.water.ca.gov/irwm/docs/RegionalsAcceptanceProcess/Individual_RAP_Summaries/ImperialValley_RAPSummary.doc2)

Brawley, El Centro, Calipatria, Westmorland, Holtville, and Calexico. The incorporated cities are responsible for water treatment, distribution and sales through their municipal utilities or by franchise agreements with investor owned utilities. They also have land use authorities and operate the wastewater treatment facilities within their jurisdiction; four of these cities (Brawley, Imperial, El Centro and Calexico) prepared their 2005 Urban Water Management Plan. There are a number of unincorporated communities, including Niland, Heber, Seeley, the Naval Air Station, and Ocotillo, which receive domestic water service and wastewater treatment services by special districts, private water companies, mutual water companies or other management structures. With the exception of the City of Imperial, all of the communities in the Imperial Region are disadvantaged under the CDWR criteria

### **Public Process Used to Identify and Involve Stakeholders**

A preliminary list of stakeholder groups, cities, special districts, trade organizations and community organizations was compiled from IID and County of Imperial records. A specific stakeholder assessment process was conducted with the support of the Center for Collaborative Policy (CCP) to identify issues and concerns and lay a foundation for subsequent outreach and involvement efforts. Additional stakeholders were identified during the assessment. Over 200 potential participants were invited to the kick-off meeting held the evening of April 22, 2010. The evening meeting was intended to allow for maximum participation. At the meeting, additional organizations and points of contact were identified. The stakeholder list is a living document that will be updated during the process, as needed. The kick-off meeting and all subsequent meetings of the Water Forum have been publicly noticed in the *Imperial Valley Press* newspaper. Total attendance at the three (3) Water Forum meetings held to date is 138 persons (53, 41, and 44, respectively), demonstrating the success of our outreach effort. The notice of intent to prepare the Imperial IRWMP and a separate notice of intent to adopt the plan will be published in accordance with government code requirements.

Water Forum representatives are the conduit between their organization and the IRWMP effort. The work plan provides for additional outreach at specific milestones in order to keep the public informed. Objectives for stakeholder involvement were established in the RAP and include:

- Promote IRWMP as the mechanism for addressing water supply issues;
- Prevent surprises for the IID Board of Directors, County of Imperial Board of Supervisors; City Councils, rate payers or stakeholders;
- Engage and inform customers, stakeholders, and the public;
- Create awareness and reach consensus on solutions, including funding strategies; and
- Reduce the potential for conflicts, manage expectations, and develop strategies to respond to identified issues and concerns

A variety of media were used in the public outreach effort to publicize the IRWMP kick-off event and encouraged public participation; these included email, the internet, newspaper, and radio. As deemed effective, these as well as written announcements, brochures, reports and existing newsletters will be used by the Water Forum for future outreach efforts. The Water Forum will leverage existing public affairs resources at IID to fulfill public relations functions. A Water Forum speakers' bureau will be

developed. The Imperial Water Forum Website<sup>4</sup> has been established and is used to publish draft and final documents including the Charter; Mission, Goals and Objectives statement; the RAP, *Draft IID Plan*, FAQs, briefings, presentations, as well as meeting dates, agendas and minutes; it will also be used to post technical memoranda and the draft and final IRWMP. Additional public outreach is planned and includes development of Spanish language materials, production of briefings that can be circulated by Water Forum members to their stakeholder groups, and development of presentations and laypersons guides for use with non-technical groups and the public.

### **DAC Identification and Involvement**

The Median Household Income (MHI) in Imperial County was \$36,894 based on US Census Bureau Estimates for 2008<sup>5</sup>. Persons below the poverty level accounted for 21.5% of the population. The Water Forum has specifically identified the Imperial Region DACs utilizing census tracts and census blocks to analyze and determine the MHI; these areas have been included in the outreach efforts. The Charter presents the list of members for both the Water Forum and RWMG. The RWMG includes three cities, two of which must be DACs, and provides a seat for a community-based organization representing environmental justice and other groups supporting DACs. A list has been compiled of special districts providing water and wastewater services, and all but two (2) are Water Forum members. The outreach program included a specific task to conduct telephone interviews to identify DAC water supply and quality needs; to identify support requirements for these communities (engineering, management, financial); and to define a preliminary list of projects. In addition, representatives from the community-based organizations are networking to form a caucus of these community groups and to ensure two-way communication. There are no Native American Tribes that have been identified in the Imperial Region.

### **Identification of Conflicts and Objectives**

The Imperial Region seeks to use the IRWMP framework to address issues and resolve conflicts through a facilitated process to reduce competition and polarization in the community, to build consensus, to provide an alternative to litigation, and to find a way forward in which water demands for agriculture, economic development, and environmental uses can be met in a more harmonious manner. The stakeholder assessment process and initial Water Forum meetings helped to identify regional issues and conflicts. The RAP contained the IRWMP 'Purpose and Need' and the statement of 'Issues and Conflicts' which have been circulated and posted on line. The *Draft IID Plan* is available online and is being used to inform the process. In short, conflicts within the Imperial Region are based on:

1. Cap on the Colorado River supply;
2. Competition for the available Colorado River Supply both within the Imperial Region and among other Colorado River users;
3. State laws and requirements to prove a long-term, reliable and sustainable supply for new development;
4. Economics; and
5. Financial capacity of the community.

---

<sup>4</sup> <http://www.imperialirwmp.org/>

<sup>5</sup> <http://quickfacts.census.gov/qfd/states/06/06025.html>

The Imperial Region derives its water supply primarily from the Colorado River. Since late 2003, the annual supply has been capped at 3.1 million acre-feet (MAF) as part of the agreements to settle long-standing inter- and intra-state issues over use of Colorado River water. In addition, the region will be transferring up to 408,000 acre-feet per year of water out of the region for urban use in the Coachella Valley and in the South Coast. The caps on Colorado River supplies along with this large transfer of water create the potential for conflicts at the local level in the Imperial Region, between current users and potential future users of the available supply, and/or among different types of water use.

As noted above, the irrigated area consumes some 96% of the water delivered to users in the Imperial Region. Thus, the cap on the Colorado River supply means that the land use agencies (Imperial County, Imperial Cities) face new challenges when making decisions and findings of sufficiency regarding the sustainability of the water supply. State law requires proof of supply and that there are no impacts to current users. The new conditions result in uncertainty during the planning process that may include potential conflict between the land use agencies and IID, and between current and future water users. Resolution will require definition of firm supplies that can be apportioned to new projects without resulting to impacts to current water users, and improved coordination between the IID, County of Imperial and the cities.

The growing competition for Colorado River supplies among the Lower Basin states, between the hydrologic regions in California, and within the Imperial Region affects the economics of water in the Imperial Region and throughout Southern California, with the scarcity making water more precious and driving up the price. Imperial Region is operating in a new market for water. It is an agricultural district operating in a scenario where municipal markets are setting the price of water, where there is a growing disparity in the rates/costs to existing users and new users, and between the Imperial Region and the rest of Southern California. The large municipal markets in Southern California can distribute costs over a wide rate base and pay much higher per unit costs. The difference in price points may also be seen as an opportunity to profit. These economic realities exacerbate the competition and conflicts over water.

The Imperial Region is classified as a disadvantaged community, and as such, there is a limited ability and willingness to pay for new capital facilities. The DAC communities also have unique water supply and quality needs, and most of the cities and developed areas in the Imperial Region are having trouble generating capital to make investments in facilities to treat drinking water and wastewater to meet regulatory standards. Also, the price per unit for development of new water supplies is high relative to the costs historically paid, and these costs may not be affordable or politically palatable to existing rate payers. New uses are faced with high costs and may have to bear the full price for supply development if existing rate payers cannot, or are not willing to pay. The region must seek creative solutions to finance new supplies. This could include obtaining state or federal grants, consolidating or regionalizing facilities to increase the cost effectiveness, and creation of public/private partnerships. Alternately, if capital facilities are not affordable, the region must find an economically efficient and equitable program to exchange water between historical and new users in the Imperial Region, while mitigating for any negative impacts to current users and the environment.

The Water Forum adopted the mission, goals and objectives for the IRWMP at the September 9, 2010 meeting, and these are currently being circulated to the stakeholder groups for acceptance. These were crafted to by a Water Forum work group to address the identified conflicts and challenges facing the region. Measureable objectives were set to allow for tracking of performance during IRWMP implementation. The objectives have not yet been prioritized pending Water Forum review of the CDWR resource management strategies and completion of a climate change analysis.

## **Mission, Goals and Objectives**

### ***Mission***

The mission of Imperial Water Forum is to preserve and enhance the economic and environmental health and well-being for the Imperial Region through the regional stewardship and comprehensive management of water resources in a practical, cost-effective and responsible manner.

### ***Goal: Water Supply:***

Diversify the regional water supply portfolio to ensure a long-term, verifiable, reliable and sustainable supply to meet current and future agricultural, municipal, commercial, industrial and environmental demands.

### ***Objective:***

1. Meet 100 % of future demands without adverse impact to existing users that are not mitigated.
2. Implement projects or programs that will provide a firm, verifiable, and sustainable supply of 50 to 100 thousand acre-feet per year for municipal, commercial or industrial demands by 2025.
3. Ensure equitable and appropriate cost sharing among water users who would receive benefits from any proposed water management project.
4. Protect surface water rights.
  - a. Optimize and sustain use of Colorado River entitlements through development of groundwater banking and storage projects.
  - b. Implement water conservation measures that demonstrate reasonable beneficial use of the available supplies and are consistent with established industry standards<sup>6</sup>, and state and federal requirements.
5. Integrate resources management strategies that diversify the regional water supply portfolio through projects such as desalination of brackish groundwater or drain water, reclaimed waste water, and stormwater reuse; or through coordinated land use and water management policies with exclusion of the Ocotillo-Coyote Wells Groundwater Basin which was designated a sole source aquifer by the U.S. Environmental Protection Agency in 1996<sup>7</sup>.

---

<sup>6</sup> Water conservation measures include Efficient Water Management Practices recognized by the Agricultural Water Conservation Council; and Demand Management Measures and Best Management Practices as defined by the California Urban Water Conservation Council; or those related actions defined by federal or state law.

<sup>7</sup> 61 FR 47752, September 10, 1996; or see <ftp://ftp.co.imperial.ca.us/icpds/eir/usg/final/17revisions-sect3.pdf>

6. Promote economic development that is consistent with existing agreements on use and management of the Colorado River water supply and is consistent with County and Cities general plans and other local ordinances and regulations.
7. Protect correlative groundwater rights and currently designated sole source aquifers from further overdraft, and optimize the use of other groundwater where feasible.

**Goal: Water Quality:**

Protect water quality for beneficial uses consistent with regional community interests and the RWQCB Basin Plan through cooperation with stakeholders, local and state agencies.

**Objective:**

1. Maintain or improve the quality of incoming Colorado River water.
2. Support disadvantaged and other communities in meeting wastewater disposal and permit requirements.
  - a. Define local and regional opportunities, evaluate economies of scale and where cost effective, develop capital facilities for wastewater reuse/reclamation.
  - b. Match water quality to appropriate uses and supply treated wastewater to extend use of Colorado River supplies.
3. Support disadvantaged and other communities in meeting drinking water standards.
  - a. Define local and regional opportunities, evaluate economies of scale and where cost effective, develop capital facilities.
4. Comply with Total Maximum Daily Loads (TMDLs) established by the Colorado River Regional Water Quality Control Board (Region 7) for the Imperial Region, and implement established Best Management Practices or other measures to minimize water quality impacts from stormwater.
5. Preserve and, where and when technology allows, improve quality of groundwater resources in Imperial Region.

**Goal: Flood Protection and Stormwater Management**

Protect life and property from flooding and develop regional and local flood protection and storm water management strategies.

**Objective:**

1. Assess regional flood control and local storm water management needs through a collaborative effort to develop policies and cost effective physical solutions.
  - a. Address vector control and safety concerns related to overflow ponds.
  - b. Encourage local agencies to maintain and enforce FEMA floodway and flood plain maps and regulations adopted by County of Imperial in 1984 so Imperial Region communities are eligible for federal flood insurance.
2. Document and define technical and policy approaches for flood and storm water management that can be integrated with other water management actions to meet multiple objectives and provide multiple benefits.

3. Evaluate and define local and regional projects that prevent or minimize flooding and damage to public and private facilities and property.

#### ***Goal: Environmental Protection and Enhancement***

Protect and enhance aquatic ecosystems and wildlife habitat consistent with municipal, commercial, industrial and agricultural land uses.

#### ***Objective:***

1. Recognize and mitigate impacts to IID drains, small natural floodways, and the New or Alamo rivers that could result from reduced flows as a result of development or reclaimed water use
2. Investigate and develop regional mitigation banking program to provide cost-effective environmental mitigation for proposed projects that reduce IID drain flow or have other adverse impacts.
3. Identify opportunities for open spaces, trails, parks and other recreational projects in the Imperial Region that can be incorporated with water supply, water quality or flood protection projects, consistent with public use and property rights.
4. Discourage or prohibit residential and commercial developments in FEMA designated floodways outside the irrigated areas to prevent damage and diversions to other developed properties.

#### ***Goal: Regional Policy Goals***

Develop regional policies in accordance with, and respecting the individual agencies' jurisdiction and authorities by engaging the water and land use agencies and other interested parties in a cooperative, regional approach.

#### ***Objective:***

1. Streamline permitting process and integrate land use and water supply planning requirements where appropriate.
2. Define cost-effective projects and equitable cost sharing agreements with those entities that would receive benefits from proposed water management projects of all types.
3. Develop consistent policy across all water and land use agencies: County of Imperial, Cities, IID, federal lands.
4. Projects relying on and overlying the Ocotillo-Coyote Wells Sole Source Aquifer shall be based on safe yield considerations and resource constraints to protect correlative rights of overlying users.
5. Recognize and mitigate impacts of proposed projects on disadvantaged communities to ensure environmental justice.

#### ***Program Preferences and Priorities***

The state has established preferences<sup>8</sup> for proposals that address specific issues or approaches. Each of the state preferences and approach to addressing them are discussed below.

---

<sup>8</sup> PRC §75026.(b) and CWC §10544

**Include regional projects or programs (CWC §10544).** Projects to meet regional supply needs and provide multiple benefits to multiple parties within the Imperial Region will be defined (groundwater banking). The Imperial IRWMP will investigate the cost-effectiveness of regional projects opportunities by comparing them to individual, silo projects that seek to meet the same objective (e.g., increase regional supply, meet wastewater standards, support DACs, etc.). This will be accomplished during the project screening and evaluation by comparison of the unit cost of projects (\$/AF yield; \$/MGD treated), evaluation of local and regional economic benefits, and the intangible costs and benefits. Capital project alternative solutions will be compared to demand management measures and to other policy approaches which could meet the same objectives.

**Effectively integrate water management programs and projects within the Imperial Region.** The work plan has been designed to integrate programs and projects across the region. From a project standpoint, regional groundwater banking and storage is to be evaluated along with consolidation of water and wastewater facilities, development of regional raw water storage for cities, and other efforts to develop new supplies. From a programmatic standpoint, opportunities to better manage, conserve and apportion existing supplies will be evaluated. This could involve developing a mechanism for apportioning water and policy which would allow water to move between the types of use or place of use within the IID services area, while staying within the region's Colorado River entitlement. Such a program would need to be equitable, politically acceptable and ensure mitigation of all negative impacts to current users and the environment. This type of program, along with regional demand management efforts, will allow for comparison of capital project solutions with non- structural management solutions to achieve the Imperial IRWMP objectives.

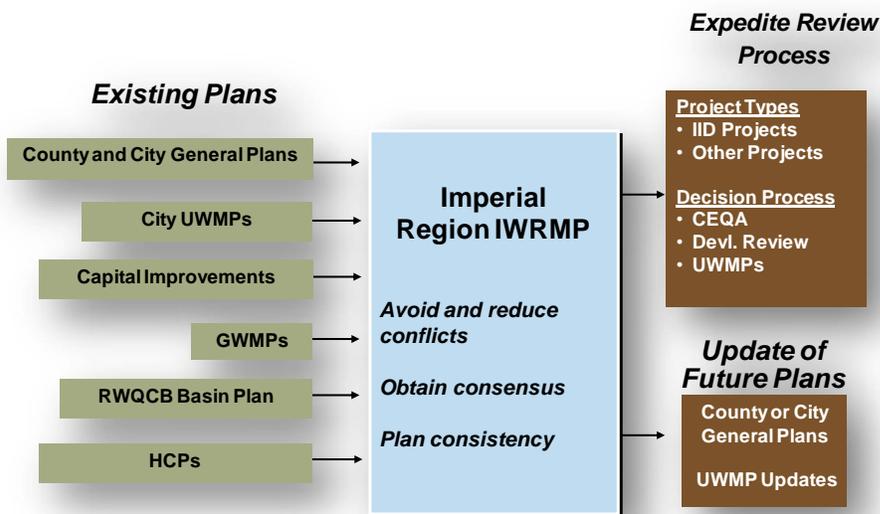
**Effectively resolve significant water-related conflicts within or between regions.** Resolving conflicts within the Imperial Region will help to forestall further inter- or intra-regional conflicts. The Imperial IRWMP goals and objectives were established based on the needs and desire within the region to address current and potential future conflicts. These conflicts are related to the water supplies, funding, and land use and water supply authorities.

**Contribute to attainment of one or more of the objectives of the CALFED Bay-Delta Program.** The South Coast Region relies heavily on both Delta and Colorado River imports, and MWD is anticipating full delivery of Colorado River water in times of drought or other shortages. Resolving issues within the Imperial Region through the Imperial IRWMP will help the area to better manage the available supplies and live within its Colorado River cap, thus continuing to support resolution of issues and conflicts related the California 4.4 MAF annual Colorado River water apportionment. Actions taken in the Imperial Region would reduce the uncertainty of the Colorado River supply to the South Coast Region and Coachella Valley, making planning for use of CALFED Bay-Delta supplies more certain.

**Address critical water supply or water quality needs of disadvantaged communities.** Six of the seven cities in the Imperial Region are classified as DACS as are all of the unincorporated areas. Given these demographics, the Imperial IRWMP Water Forum and RWMG Charter governance structure specifically includes representation by Imperial cities and special districts servicing DACs, and community-based organizations. The intent is to address environmental justice and other concerns of the members of the

DACs and of any other underrepresented communities. The work plan includes DAC outreach, definition of DAC needs, and provision of technical support services to formulate project requirements to address those needs.

**Effectively integrate water management with land use planning.** The work plan includes tasks to coordinate Water Forum work groups to review issues, define needs and develop alternatives to better integrate the land use and water supply plans and planning process. This includes a regional water supply assessment; coordinating development of the IRWMP with the 2010 updates of the UWMP; developing the standards and guidelines for Water Supply Assessments (WSAs), including defining local requirements for submitting information and for the coordination between the land use agencies and IID; and establishing standards and guidelines for evaluating and mitigation water supply and quality impacts and making findings and decisions pursuant to CEQA, SB 610 and SB 221 requirements. County of Imperial is responsible for groundwater management. The project will include development of Groundwater Management Plan (GWMP) components of the Imperial IRWMP to help County manage groundwater in the sole source aquifer that supplies the Ocotillo area, and to develop available groundwater and groundwater storage potential in the East Mesa if this is a feasible option.



**Figure 3 Plan Integration**

**Stormwater/Flood Management Funding.** The Imperial IRWMP work plan includes review of existing stormwater and flood management facilities, policies and programs. Water Forum work groups will be used to define needs, develop project concepts, and establish guidelines for further project and program development, including technical approaches to addressing local stormwater flooding, development of revised design standards and guidelines, development of governance structures, and funding approaches and priorities to implement integrated, multi benefits solutions for stormwater and flood management.

**Address Statewide priorities.** Table 1 lists some of the approaches that will be used in the Imperial IRWMP to address specific Statewide Priorities for the IRWM Grant Program.

**Table 1- Imperial IRWMP and Statewide Priorities**

Statewide Priority	Description
Drought Preparedness	<p>Evaluate regional conjunctive use and groundwater banking opportunities.</p> <p>Evaluate urban raw water storage requirements to address supply interruptions and meet standards; define needs, evaluate alternatives; design regional project approaches.</p> <p>Develop Groundwater Management Plan (GWMP) components for integration into the IRWMP to support County of Imperial management effort.</p> <p>Investigate system inerties to support drought response or response to supply interruptions.</p>
Use and Reuse Water More Efficiently	<p>Evaluate regional wastewater reuse and recycling projects and identify opportunities to increase cost effectiveness through regional consolidation.</p> <p>Development of water supplies for new MCI uses through evaluation of urban, industrial and agricultural water use efficiency; water exchanges/apportionment within IID service area.</p> <p>Investigate alternative power plant cooling technologies consistent with requirements of the California Energy Commission, and seek public/private partnerships to demonstrate and test best management practices to be included in the implementation plan.</p>
Climate Change Response Actions	<p>Renewable energy projects represent the largest increase in future water demand and for economic development.</p> <p>Evaluate groundwater storage and banking alternatives for Colorado River water in underrun years to pay back overruns and supply new {renewable energy) demands. Such a bank would mitigate for negative impacts to current users from new renewable energy water uses.</p> <p>Development of alternative water supplies would support expansion of renewable energy production in the region (mainly geothermal). The Imperial IRWMP will define and compare alternative water supplies for proposed renewable energy projects. Such projects would reduce the GHG emissions as compared to conventional power generation. Sources to be evaluated for use in lieu of Colorado River supplies include recycled wastewater and desalination of brackish groundwater or drain water.</p> <p>Climate change and GHG criteria will be included in the screening and evaluation criteria for selection and integration of resources management strategies, and when comparing project alternatives.</p>