



July 19, 2016

California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
Post Office Box 942836  
Sacramento, CA 94236-0001  
Attn: Leslie Pierce

[DWR\\_IRWM@water.ca.gov](mailto:DWR_IRWM@water.ca.gov)

**Subject: Comments on Revised Draft 2016 Water-Energy Grant Program Guidelines and Proposal Solicitation Package**

Dear Ms. Pierce:

The Coachella Valley Water District (CVWD) would like to express our appreciation to the California Department of Water Resources (DWR) for revising the Draft 2016 Water-Energy Grant Program Guidelines, and for allowing us an opportunity to provide comments.

We have three specific comments regarding the Draft 2016 Water-Energy Grant Program Guidelines, which include the following and are outlined below:

- Extension to Residential Programs
- Limitations of Eligible Project Types
- Fund Priority Projects from Previous Solicitation

**EXTENSION TO RESIDENTIAL PROGRAMS**

We appreciate that DWR has extended eligibility for the 2016 Water-Energy solicitation to include residential water-energy efficiency programs or projects that benefit economically disadvantaged communities (DACs). Our service area, and the Coachella Valley as a whole, has many residential DACs that could benefit from grant funding through this program. Allowing these entities to be eligible for funding through the 2016 Water-Energy Grant Program helps to ensure that DACs remain interested and involved in water management and water-energy efficiency programs in our region, and throughout the state.

## LIMITATIONS OF ELIGIBLE PROJECT TYPES

While we appreciate that DWR has expanded eligibility requirements in the Draft 2016 Water-Energy Grant Program Guidelines, the eligibility requirements continue to be overly limited. As currently written, only ten (10) very specific types of projects are eligible for grant funding, including:

- Commercial Dishwashers
- Commercial Ice Machines
- Commercial Steam Cookers
- Commercial Clothes Washers
- Showerheads
- Faucets
- Pre-Rinse Spray Valves
- Boiler-less Combination Ovens
- Residential Clothes Washers
- Residential Dishwashers

This list of project measures is overly restrictive, and therefore eliminates many high priority projects in our region from being eligible for the 2016 Water-Energy Grant. Further, the restrictive nature of the project measures will not allow our region or the state to effectively meet the goal of the 2016 Water-Energy Program, which per DWR is to, “reduce greenhouse gas (GHG) emissions and also reduce water and energy use by funding commercial and institutional water-energy efficiency programs or projects and residential water-energy efficiency programs or projects benefitting DACs.”

In the Coachella Valley, there are many types of projects that would reduce GHG emissions, water, and energy use through conservation. Given that water in our region is largely pumped from local groundwater basins, offsetting potable water use via conservation both directly saves water and saves energy/reduces GHG emissions. Furthermore, several studies that have been conducted in our region have demonstrated that water conservation is a highly cost-effective way to save both water and energy. However, these types of high-benefit, cost-effective strategies are not currently eligible for the 2016 Water-Energy Grant Program due to the restrictive nature of the current Draft Guidelines.

We strongly request that DWR modify the types of projects that are eligible for funding through the 2016 Water-Energy Grant Program, and allow applicants to individually determine the best projects to save water and energy, rather than having a very limited and prescriptive list.

## FUND PRIORITY PROJECTS FROM PREVIOUS SOLICITATION

As you are probably aware, CVWD, in conjunction with another local water agency (the Desert Water Agency or DWA), submitted an application for the 2014 Water-Energy Grant Solicitation. In the 2014 solicitation, DWR received nearly 100 applications for the \$28 million that was available, and was only able to recommend funding to 22 of the applications that were submitted. These figures show that there is a substantial demand for grant funding to help fund priority projects throughout the State that would save both water and energy.

Given the overwhelming demand for this funding, and the fact that DWR has already completed a solicitation and evaluation of projects throughout the state, we request that DWR provide the additional 2016 funding that is available (\$19 million) to the applicants that were not funded in the 2014 Water-Energy Grant Solicitation. This would allow applicants such as CVWD to save time and money associated with preparing additional applications. Further, it would allow DWR to expedite delivery of funding for high priority needs across the state.

## CONCLUSION

We sincerely appreciate the opportunity to provide comments on the Draft 2016 Water-Energy Grant Program Guidelines, and we value our participation in the statewide IRWM Program. We look forward to reviewing the Final 2016 Water-Energy Grant Program Guidelines, and are hopeful that the changes and issues we have raised in this letter will be addressed.

Sincerely,

A handwritten signature in black ink that reads "Patti Reyes". The signature is written in a cursive, flowing style.

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