



# COACHELLA VALLEY WATER DISTRICT

*Established in 1918 as a public agency*

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April 6, 2023

**VIA U.S. MAIL AND EMAIL** [LCBEfficiency@usbr.gov](mailto:LCBEfficiency@usbr.gov)

Jacklynn L. Gould  
Regional Director  
United States Department of Interior  
Interior Region 8 - Lower Colorado River Basin  
P.O. Box 61470  
Boulder City, NV 89006-1470

Dear Ms. Gould:

Subject: Input on the next phase of Inflation Reduction Act funding in the  
Lower Colorado River Basin System Conservation and Efficiency Program

The Coachella Valley Water District (CVWD) appreciates the opportunity to comment on Bureau of Reclamation's Phase II of the Lower Colorado River Basin System Conservation and Efficiency Program (Program), which is focused on longer-term durable solutions for water conservation using a portion of the \$4 billion funding available in the Inflation Reduction Act (IRA). Recognizing the wide scope of funding needs, CVWD would like to advocate for large-scale turf removal programs to be considered during this program phase.

Founded in 1918, CVWD's original mission was to secure and deliver water primarily for agricultural use. Although the agricultural economy is no less important today, CVWD has expanded our mission to include meeting the needs for drinking water, groundwater replenishment, wastewater treatment, and regional storm water management that covers an approximate area of 1,000 square miles in Riverside, Imperial and San Diego counties.

CVWD has been a willing and solution-driven partner on the Colorado River, as most recently evidenced by taking actions in 2022 to curtail 9,083 acre-feet (af) of water from CVWD's groundwater replenishment facility for the benefit of the Colorado River. Once approved by Reclamation, this program along with a proposed agriculture conservation program may save as much as 135,000 af from 2023 to 2026. Additionally, CVWD has implemented other short and

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long-term conservation in various sectors, and some projects were conducted with Reclamation's assistance. These actions and highlights include:

#### Colorado River Water Use

- Metering Colorado River water customers' consumption for accurate and timely water accounting
- Converting to drip irrigation by over 60% of CVWD's customers
- Using less than 3.8 acre-feet per acre per year on irrigated lands
- Saving over 158,000 af/yr through canal lining (26,000 af/yr is transferred to the San Diego County Water Authority)

#### Municipal and Recycled Water Use

- Adopting municipal water rates to encourage efficient water use
- Funding turf removal (\$34 M invested, 23 M sq. ft turf removed, 28,000 af saved)
- Investing in recycled water supply (currently at 10,000 af/yr that displaces other sources)

#### **Funding need for Large-Scale Turf Removal**

Even with the successes achieved, one of the last missing pieces of the Colorado River water conservation puzzle for CVWD is the conversion of large-scale turf landscaping, including golf courses. CVWD entered into a memorandum of understanding (MOU) with other Colorado River Basin municipal and public water providers in 2022 to reduce nonfunctional turf by 30%, which brought even greater awareness to this issue. Through various golf forums and experiences with existing golf course conversions, it is estimated that water savings of 50% or greater may be achieved through these efforts at a cost comparable to municipal turf removal, without unduly harming this important part of Coachella Valley's economy.

Many of CVWD's large-scale landscape customers, including golf courses and homeowner associations, occupy properties landscaped with turf (developed prior to the current stringent water-use standards) and primarily rely on Colorado River water for irrigation. Through numerous discussions with the community, many course superintendents share a desire to reduce golf water use. One limiting factor to date has been the high price of system-wide upgrades (several million dollars per golf course). Additionally, complications with California's Proposition 218 and other state laws prevent CVWD from applying available funds (generated by domestic water customers) for other water users, including Colorado River water customers.

CVWD recognizes the need within IRA funding to maximize the volumetric benefits to the Colorado River system, but believes the second phase of the Program should include some funding for more difficult-to-implement conservation projects such as large-scale turf removal. While this may be a more costly option than other conservation measures (e.g. canal lining and

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on-farm efficiency projects), funding these projects, subject to some conditions, would be a prudent expenditure to promote long-term water savings in these sectors. These conditions include the conserved water be left in the river system for a defined period, after which the conserved water would be returned to the originating agency.

With an investment now, the Bureau of Reclamation can positively influence a historically overlooked sector in the Coachella Valley and for all those who irrigate landscaping with Colorado River water. When evaluating this opportunity, CVWD respectfully asks that Reclamation review these projects in comparison to other similar programs, including landscaping conversion and turf removal.

Please contact Robert Cheng, Assistant General Manager at 760-398-2651, extension 2263 or via email at [rcheng@cvwd.org](mailto:rcheng@cvwd.org) with any questions.

Sincerely,



J. M. Barrett  
General Manager

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