

Coachella Valley Integrated Regional Water Management Implementation Grant Proposal

Disadvantaged Community Assistance

Attachment 12 consists of the following items:

✓ **Funding Match Waiver**

This *Coachella Valley IRWM Implementation Grant Proposal* is requesting a funding match waiver for the Short-Term Arsenic Treatment Project.

✓ **Documentation of Presence and Needs of DACs**

Local DACs are defined and mapped using U.S. Census 2000 and Nielsen Claritas 2010 data. Critical water supply and water quality needs identified by local DAC representatives are summarized.

✓ **Description of Proposed Projects and Targeted Benefits to DACs**

The targeted benefits to local DACs from the proposed project(s) are described.

✓ **Documentation of DAC Representation and Participation**

The specific actions undertaken by the CVRWGM to engage DAC representatives are described. DAC representatives participate in the Coachella Valley IRWM program as Planning Partners and in development and submittal of the proposed projects contained herein.

✓ **Letters of Support**

Letter of support from DAC representatives for the *STAT Project* is included in Appendix 12-1.

This attachment documents information regarding the Short-Term Arsenic Treatment (STAT) project, which addresses a critical water quality need in an East Valley disadvantaged community (DAC). This attachment addresses the funding match waiver, documents the presence and needs of DACs, describes the proposed project and targeted benefits to DACs, and documents DAC representation and participation in the Coachella Valley IRWM program.

Funding Match Waiver

The STAT project, submitted by Pueblo Unido, CDC, is applying for a funding match waiver. Pueblo Unido will provide \$106,060 in funding match (16%) through in-kind services from Pueblo Unido and funds from St. Anthony Ownership.

Presence and Needs of the DAC

The Coachella Valley has a wide range of DACs from different demographics, including migrant and seasonal farm workers, very low-income families, urban residents, and low-income seniors. Water management issues that have been identified to date by DAC representatives include arsenic contamination in drinking water supplies, sanitation needs to protect groundwater, health, and safety and, in general, affordability and accessibility of water.



A DAC is identified as a community with an average MHI of less than 80 percent of the stateside MHI. MHI's were estimated through 2000 U.S. Census Bureau data for Coachella Valley census tracts and with 2010 Nielsen Claritas data for census block groups. Census tracts are small, relatively permanent geographic entities within counties delineated by a committee of local data users. Mapping at the Census tract scale is only available using 2000 Census data; the 2010 Nielsen Claritas data was also analyzed to give more current and detailed information regarding the MHI of incorporated cities and unincorporated communities within the Region. According to 2000 Census data, statewide MHI in year 2000 was \$47,493 and DACs are considered those who earned less than \$37,994.

According to the 2010 Nielsen Update Demographics model, the Statewide MHI for 2010 was \$62,401, and DACs are therefore communities with an MHI less than \$49,921. MHI's for the region were estimated through 2000 U.S. Census Bureau data for Coachella Valley census tracts and with 2010 Nielsen Claritas data for census block groups. Census tracts are small, relatively permanent geographic entities within counties delineated by a committee of local data users. Mapping at the Census tract scale is only available using 2000 Census data; the 2010 Nielsen Claritas data was also analyzed to give more current and detailed information regarding the MHI of incorporated cities and unincorporated communities within the Region. Using this information, all nine cities in the Coachella Valley contain pockets of communities that would qualify as DACs. In addition, this dataset shows that the unincorporated communities of Desert Edge, North Shore, Mecca, Oasis, Sky Valley, Thermal, Thousand Palms, and Vista Santa Rosa also qualify as DACs. Figure 12-1 shows DACs at the census block group-level using the 2010 Nielsen Claritas data.

Many communities within the East Valley are dependent on on-site drinking water wells that are reported as having elevated arsenic levels. Moreover, these communities pay relatively high rates for their groundwater supply, and in many instances must travel long distances to purchase alternative bottled water. Lack of transportation creates an additional barrier to purchase of bottled water. Some DAC areas within the Coachella Valley contain remote or difficult to serve areas that are not within the path of development or close to municipal services for water and wastewater service. These communities have special difficulties in affordability of water-related services.

The STAT project is comprised of several DAC pockets within the East Valley, as shown in Figure 12-2. These DACs are predominantly made up of farm workers living in mobile home parks. These DACs receive their drinking water from wells that have consistently tested high in arsenic, a known carcinogen. The water quality, aside from the arsenic is good. The DACs are currently in need of reliable quality drinking water for the residents of the area.

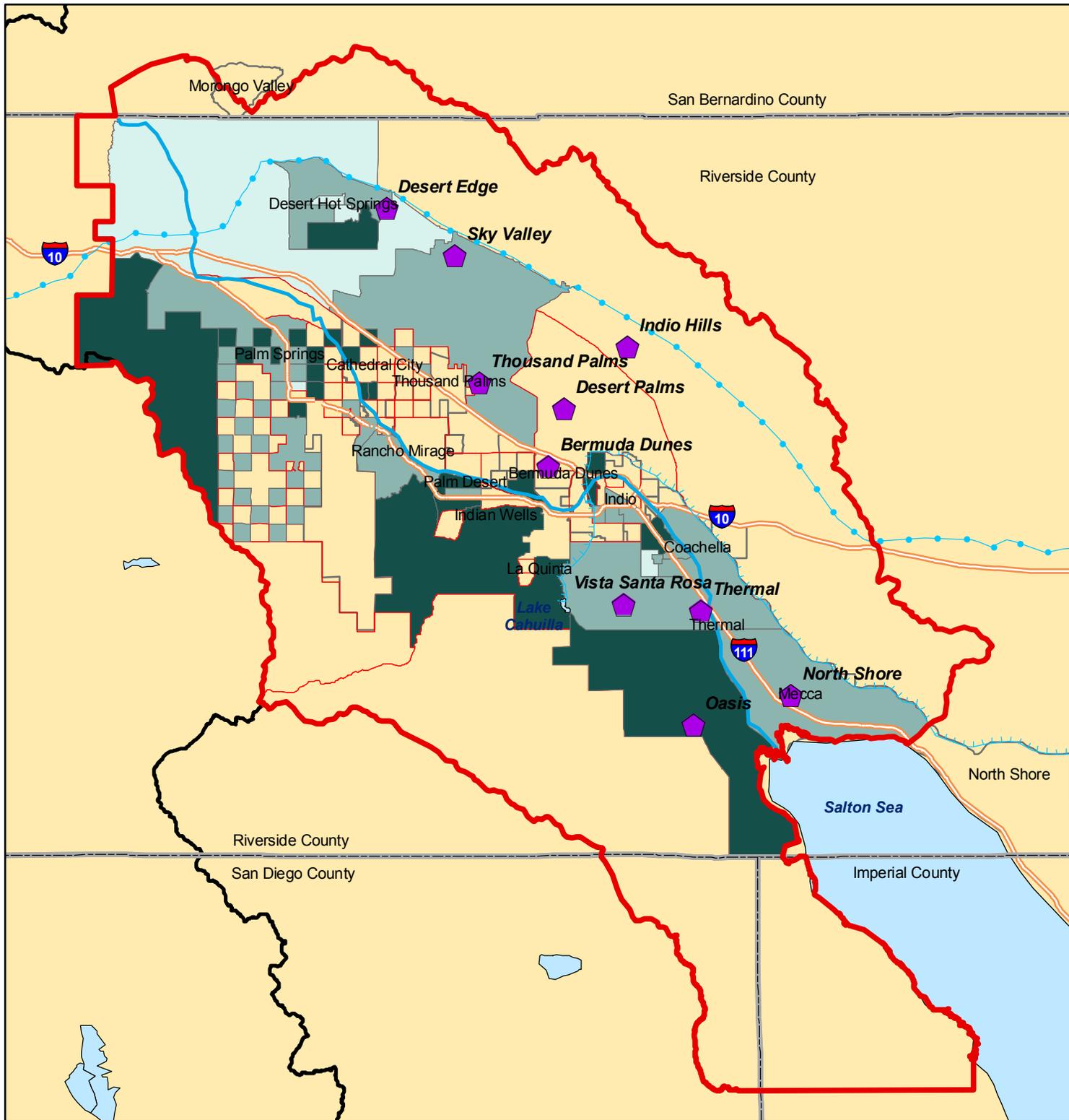
Proposed Project and Targeted Benefits to the DAC

The STAT project proposes point-of-entry and point-of-use reverse osmosis (RO) treatment to deliver the community with reliable quality drinking water. The project would consist of the construction and implementation of five point-of-entry RO systems and 280 point-of-use RO systems installed under the kitchen sinks of a participant's mobile home. Studies have shown the RO can be up to 95 percent effective in the removal of arsenic from water. Additionally, the STAT project includes a comprehensive outreach and training program to ensure public awareness and education. The STAT will require ongoing monitoring to ensure proper operation of the systems. Each mobile home park will have its own water quality monitoring program and will sustain its own operational budget and maintenance. The benefit to the DAC is a reliable source of drinking water for their community and education and job training in water management operations. The DACs that will benefit from this project may lie within the Torres Martinez Desert Cahuilla Indian reservation.

No environmental justice issues or substantial environmental impacts (beyond minimal temporary construction-related impacts) are anticipated to result from the STAT project.

Disadvantaged Communities (Claritas Data)

Figure 12-1



- Community Councils
 - Colorado River Aqueduct
 - Coachella and All American Canals
 - Whitewater River Stormwater Channel
 - Interstate Hwys.
 - Lakes
 - City or Unincorporated Community
 - Coachella Valley IRWM Region
 - Colorado River Funding Area
 - County Lines
- Median Household Income (2010)
- \$0 - \$30,000
 - \$30,000 - \$40,000
 - \$40,000 - \$49,921
 - >\$49,921

Statewide median household income (MHI) in year 2010 was \$62,401. Disadvantaged communities are considered those who earned less than \$49,921 (80% Statewide MHI)
Source: Nielsen Claritas 2010

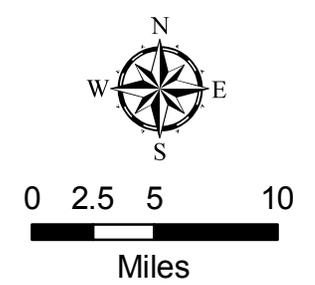
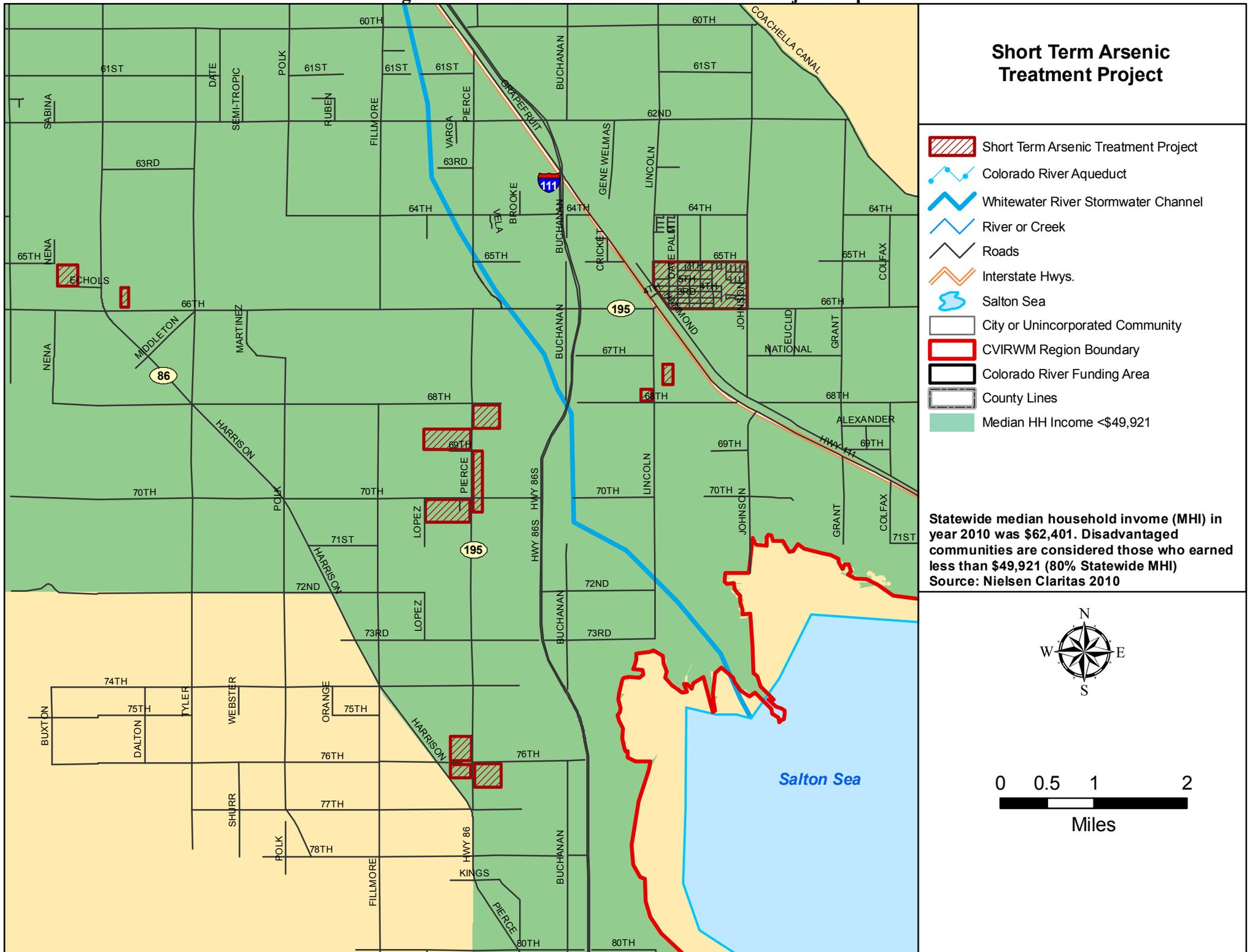


Figure 12-2: Short Term Arsenic Treatment Project Map



Short Term Arsenic Treatment Project

-  Short Term Arsenic Treatment Project
-  Colorado River Aqueduct
-  Whitewater River Stormwater Channel
-  River or Creek
-  Roads
-  Interstate Hwys.
-  Salton Sea
-  City or Unincorporated Community
-  CVIRWM Region Boundary
-  Colorado River Funding Area
-  County Lines
-  Median HH Income <\$49,921

Statewide median household income (MHI) in year 2010 was \$62,401. Disadvantaged communities are considered those who earned less than \$49,921 (80% Statewide MHI)
 Source: Nielsen Claritas 2010





DAC Representation and Participation

The goal of DAC outreach is to identify and obtain input from groups that may be otherwise unable or deterred from participating in the IRWM planning and implementation efforts due to financial and other constraints. Through targeted outreach, the CVRWMG seeks to learn more about the major water-related concerns facing these groups such that long-term implementation of the IRWM Plan is responsive to those needs. This effort builds upon the work conducted by the Disadvantaged Community Planning Group, established in 2007 to track the progress of DAC programs under Proposition 84.

Typical communities targeted as part of the DAC and environmental justice (EJ) outreach are groups that have historically been disproportionately impacted with respect to the development, implementation, or enforcement of environmental laws, regulations, and policies due to race, culture, or income. The following is a list of outreach activities employed to engage DACs within the region:

DAC/EJ Outreach Meetings

During development of the 2010 Coachella Valley IRWM Plan, the CVRWMG hosted three meetings with DAC/EJ members (described below) to better understand their critical water supply and water quality needs and to identify potential solutions. Initial meetings focused on bringing any groups that were not involved in the earlier efforts up to speed and informing all groups about recent activities and opportunities. Subsequent meetings expanded the methods of outreach in DAC/EJ communities, updated those groups which may not be able to attend or participate in broader Planning Partners meetings, and developed IRWM planning efforts to meet the needs of each community.

Meetings may be held at times convenient for DAC/EJ representatives (recognizing that this may include evenings and/or weekends) and in different geographic locations within the Region. Meeting preparation included public meeting notices and invitations, development and distribution of presentations, meeting handouts and minutes, and coordination of speakers/presenters.

DAC Issues Group

DAC needs and issues were identified as special and different than other groups at the initiation of IRWM planning efforts. The DAC Issues Group held their first meeting in May 2010, with two subsequent meetings in July and September 2010. Table 12-1 indicates the principal participants who were represented in meetings. The meetings were facilitated and technical assistance provided by the CVRWMG.



Table 12-1: DAC Issues Group Participants

Name	Organization
Anna Lisa Vargas*	Poder Popular
Betty Leehan	Desert Edge Community Council
Cindy Nance*	Desert Edge Community Council
Debbie Davis*	Environmental Justice Coalition for Water
Ed Houser	Desert Edge Community Council
Elanor Dullen	Desert Edge Community Council
Jeff Hays*	Desert Alliance for Community Empowerment
Jennifer Clary	Clean Water Action
Jennifer Hernandez	California Rural Legal Assistance Foundation
Jose Huerta	Poder Popular
Laurel Firestone	Community Water Center
Martha Guzman Aceves	California Rural Legal Assistance Foundation
Megan Beaman Carlson*	California Rural Legal Assistance Foundation
Miriam Torres*	Environmental Justice Coalition for Water
Rita Sonnenberg	Desert Edge Community Council
Sergio Carranza*	Pueblo Unido CDC
Yvonna Cazares*	Environmental Justice Coalition for Water

*These DAC Issues Group participants are also Planning Partners.

Several DAC representatives were also invited to the Planning Partners to support Plan development. DAC Issues Group meetings will continue to be held as needed to assist the DACs in project development and Plan implementation.

A brief discussion of the results of the DACs Issues Group meetings are as follows:

- May 2010 Meeting.** The group received an overview of the state’s IRWM program, upcoming Prop 84 funding opportunities and the activities considered relevant to IRWM planning. They were also updated on water-related issues identified to date, including water supply, water quality, wastewater, and flooding, through a review of local water management plans and studies. These issues include the arsenic issues in the East Valley groundwater supply. The group was also provided with a summary of the proposed stakeholder and public outreach strategy, including the DAC Outreach Demonstration Program proposal that had been submitted to DWR for additional funding.
- July 2010 Meeting.** The group was provided an update on the IRWP program and the Prop 84 funding opportunities. The call for projects timeline was reviewed and the importance of submittal emphasized. Support was raised for a project addressing critical drinking water needs in East Valley, particularly the arsenic contamination issue. Recommendations were made that a couple members of the DACs Issues Group attend the Planning Partners group meetings as DAC representatives—the group agreed. Finally, an updated was given on the DAC Outreach Demonstration Program and the goals of the program presented.
- September 2010 Meeting.** An updated was given on the IRWM program schedule, including the DAC Outreach Demonstration Program, which was still undergoing review by DWR’s legal team. The group received an overview of the ranked Prop 84’s project list. The STAT project was discussed specifically with Pueblo Unido explaining the details of the project to the group.



Notices and Newsletters

CVRWMG staff worked with community leaders to identify appropriate methods for notifying members of DAC/EJ communities of the current state of the Valley's water-related resources, the IRWM program, and solutions being generated to address their needs. These methods included techniques such as notices at community gathering sites, multi-lingual newsletters, mailings, phone surveys, door-to-door surveys, and public meetings within the communities. The focus of these efforts was to identify the critical needs of the targeted communities. Once identified, these critical needs were translated into long-term targets for the IRWM Plan. In addition, one-on-one communication between representatives from DACs and the CVRWMG were used to encourage participation in IRWM public meetings.

CVRWMG Coordination

Several CVRWMG partner(s) were identified as the liaison with DAC/EJ organizations, so it is clear how coordination and communication would occur. Additionally, several DAC representatives were also invited to the Planning Partners to support Plan development and project selection.

DAC Outreach Demonstration Program

The CVRWMG identified the opportunity for more comprehensive efforts relating to DAC outreach and submitted a DAC Outreach Demonstration Program proposal to DWR for potential funding. If funding is approved, the following additional goals will be achieved as part of the DAC Outreach effort:

- Development of a DAC Community Planning Group to represent one of the Issues Groups;
- At least five (5) DAC Workshops addressing specific community needs;
- Coordination with Community Leaders;
- Flood Control Mapping in DAC Areas;
- Preparation of a DAC IRWM Plan Element;
- DAC Outreach Demonstration Project White Paper.

Correspondence

Several DAC or EJ communities had direct connection with a CVRWMG partner and consultants. Communication was conducted mainly via telephone and email; however, office and field site visits were also arranged as needed. Through one-on-one communication, the CVRWMG encouraged participation by DAC representatives in IRWM public meetings.

Letters of Support

The following letters of support were submitted by agencies and organizations representing DACs in the Coachella Valley region.

- California Rural Legal Assistance Migrant Farmworker Project, Coachella Regional Office (dated November 16, 2010)



CALIFORNIA RURAL LEGAL ASSISTANCE, INC.

MIGRANT FARMWORKER PROJECT, Coachella Regional Office

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Santa Cruz	(831) 458-1089
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Stockton	(209) 946-0605
Watsonville	(831) 724-2253

November 16, 2010

Coachella Valley Regional Water Management Group
C/O Patti Reyes, Coachella Valley Water District
85-995 Avenue 52
P.O. Box 1058
Coachella, CA 92236

RE: Support for Eastern Coachella Valley Short-Term Arsenic
Treatment Program/Project

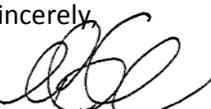
Dear Ms. Reyes and Water Management Group Representatives:

California Rural Legal Assistance, Inc. ("CRLA") is a non-profit legal services corporation providing free legal assistance to many low-income Coachella Valley residents as well as rural low-income Californians around the state. We have extensive historical roots in Coachella Valley's farmworker and mobilehome communities (which are largely one and the same) and have advocated on a very broad array of issues facing them. As you know, we are also a member of the DAC group and Planning Partners teams for the Coachella Valley IRWMP. The purpose of this letter is to extend our support for the Eastern Coachella Valley Short-Term Arsenic Treatment Program/Project proposed by Pueblo Unido Community Development Corporation through the Coachella Valley Integrated Regional Water Management Plan.

Thousands of low-income and largely farmworker families live in mobilehome parks throughout the eastern Coachella Valley. The great majority of those mobilehome parks were constructed without proper infrastructure and do not meet other building standards. In those parks, water is frequently provided by means of a private on-site well, which is owned and operated by the mobilehome park's owners. In many regions, the water flowing from those private wells is contaminated with naturally-occurring arsenic. Many or most East Valley park owners do not have the traditional business resources one would expect to see in the context of a residential housing development and are not able to invest in the tools necessary to provide clean potable water to their residents.

The practical result of this scenario is a severe shortage of potable drinking water for East Valley residents, all of whom are low-income, and most of whom are farmworkers. For this reason, the Short-Term Arsenic Treatment Project proposed by Pueblo Unido Community Development Corporation is an absolutely imperative step toward the provision of potable water to Coachella Valley residents. It is without reservation that CRLA supports this proposal.

Sincerely,



Megan Beaman Carlson