



California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
Post Office Box 942836  
Sacramento, CA 94236  
Attn: Craig Cross

Dear Mr. Cross:

The City of Antioch appreciates the opportunity to comment on the draft funding recommendations for Round 1 of the Proposition 1E Stormwater Flood Management funding program. Based upon our review of our scoring summary, our understanding of other submitted proposals, and a review of the scoring summaries of other proposals, we have prepared the following comments for your consideration.

- **The City of Antioch Stormwater Flood Management Grant Proposal Should Receive 8/10 Points for Program Preferences.** As described in Attachment 11: Program Preferences, the West Antioch Creek Channel Improvement Project will achieve the following seven program preferences:
  1. Include Regional Projects or Programs
  2. Integrate Water Management Strategies
  3. Contribute to One or More CALFED Objectives
  4. Address Water Supply and Water Quality Needs of DACs
  5. Integrate Water and Land Use Management
  6. Not Part of a State Plan of Flood Control and Provides Multiple Benefits, and
  7. Address Statewide Priority.

Of particular importance, as described in the proposal, are the benefits that will accrue to DACs. The project will eliminate flooding to a DAC that occurs multiple times per year, causing public health and water quality concerns as well as significant economic damage. The project scoring summary inaccurately attributes only four program preferences to the project:

1. Include Regional Projects or Programs,
2. Contribute to Attainment of One or More of the Objectives of the CALFED Bay-Delta Program,
3. Expand Environmental Stewardship, and
4. Practice Integrated Flood Management.

As such, the project achieves a greater breadth of program preferences than credited in the scoring, including significant benefits to a DAC – a preference that is purportedly of significant importance to the Department of Water Resources (DWR) and the Integrated Regional Water Management Program. The scoring summary incorrectly states that the proposal provides limited certainty that the benefits will be achieved. As described in the proposal, the certainty that these benefits will be achieved is well-supported as follows:

- The project is part of a long-standing Flood Control District Zone Plan, which has been underway since 1985.
- The project and its benefits are supported by both an Environmental Impact Report and an Engineer's Report prepared by the Army Corps of Engineers.
- This project is focused on improving one specific channel segment of West Antioch Creek and is not reliant on any additional projects being completed.
- This project is the City's number one priority flood control project within the region, and will be implemented expeditiously on receipt of funding.

The City of Antioch's proposal meets all criteria identified in the Proposal Solicitation Package to receive a score of 4/5, as follows:

- ✓ *Includes a project(s) that implements one or more Program Preference, but does not address practice integrated flood management, protecting water quality, and expanding environmental stewardship. As acknowledged in the scoring summary, the City's Project addresses all three of these program preferences.*
- ✓ *The proposal also needs to demonstrate with a significant degree of certainty that the Program Preference claimed can be achieved, and thoroughly documents the breadth and magnitude of the Program Preference to be implemented. The scoring summary acknowledges that the program preferences will be achieved. As discussed in the proposal, the significant breadth, depth, and certainty that benefits will be achieved is supported by documentation including an Environmental Impact Report and an Engineer's Report prepared by the Army Corps of Engineers. It is unclear how the depth, breadth, and certainty of benefits can be considered uncertain in light of this extensive documentation.*

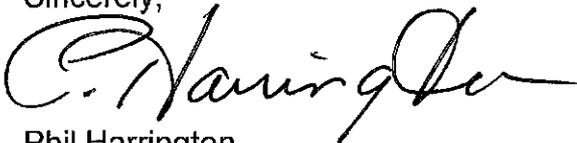
The City of Antioch requests that the proposal scoring be revised to attribute an additional two points, reflecting the greater depth and breadth of program

preferences achieved by this project than attributed in the initial scoring process. This would result in a total score of 42 points, which would place the proposal within the funded proposals list.

- **The Recommended Funding Awards Should be Adjusted to Reflect the Changes Above:** Implementing the two recommended changes above would result in the modifications to the recommended funding awards identified in Table 1 (attached; note: only proposals scoring 40 – 42 points have been included, as no other proposal funding amounts would be affected). As shown in the attached table, implementing these recommended changes would provide the following benefits, with no identified drawbacks:
  - *Increases Accuracy:* Corrects scoring and classification inaccuracies.
  - *Increases Stormwater Management and Flood Protection Benefits Achieved:* Allows an additional four projects to move forward, significantly increasing the overall benefits achieved.
  - *Improves Return on Investment for DWR and Proposers:* Increases the overall program benefits achieved and return on investment for the funding program, considering both the cost of preparing an application and the cost of reviewing applications.

The City of Antioch appreciates the opportunity to comment on the draft funding recommendations. We implore you to consider correcting the scoring and project classification errors identified above, as these changes will not only improve the accuracy and equity of the funding recommendations, but will yield significant stormwater and flood control benefits statewide. Please do not hesitate to contact me with any questions or for additional information.

Sincerely,



Phil Harrington  
Director of Capital Improvements/Water Rights

**Table 1: Proposed Modifications to Funding Awards (Only Projects Scoring 40 – 42 Are Affected)**

Rank	Applicant	Proposal Title	Score	Total Cost	Grant Request	Original Award	Original % of Grant Request	Revised Award	Revised % of Grant Request	Change in Award
14	San Luis Obispo County Flood Control & Water Conservation District	San Luis Obispo County Proposition 1E Proposal-Flood Control Zone 1/1A Waterway Management Program, Alternative 3a Project	42	\$5,647,369	\$2,797,000	\$2,797,000	100%	\$2,797,000	100%	\$0
15	City of Fresno	Fancher Creek Flood Control Improvement Project	42	\$4,462,173	\$2,231,086	\$2,231,086	100%	\$2,231,086	100%	\$0
16	San Francisco Creek Joint Powers Authority	San Francisco Creek Flood Protection and Ecosystem Restoration Capital Improvement Project, East Bayshore Road to San Francisco Bay - Phase 1	42	\$16,700,000	\$8,000,000	\$8,000,000	100%	\$8,000,000	100%	\$0
17	City of Antioch	City of Antioch Stormwater Flood Management Grant Proposal	42	\$5,994,600	\$2,997,300	0	0	\$2,997,300	100%	+\$2,997,300
18	City of Fortuna	Rohrer Creek Flood Control and Riparian Habitat Improvement Project	41	\$6,901,764	\$3,394,652	\$2,423,163	71%	\$3,394,652	100%	+\$971,489
19	American Rivers	Stormwater Source Control in the CABY Region	40	\$1,020,000	\$510,000	0	0	\$510,000	100%	+\$510,000
20	City of Fontana	Vulcan Pit Flood Control and Aquifer Recharge Project	40	\$19,900,000	\$9,950,000	0	0	\$5,521,211	55%	+\$5,521,211
<b>TOTAL</b>										<b>+\$10,000,000</b>