



NORTHEASTERN SAN JOAQUIN COUNTY GROUNDWATER BANKING AUTHORITY

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CALIFORNIA WATER SERVICE COMPANY
CENTRAL DELTA WATER AGENCY
CENTRAL SAN JOAQUIN
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SAN JOAQUIN COUNTY
SOUTH DELTA WATER AGENCY
WOODBIDGE IRRIGATION DISTRICT
SAN JOAQUIN FARM BUREAU
FEDERATION - ASSOCIATE MEMBER

SENT VIA EMAIL
DWR_IRWM@water.ca.gov

November 19, 2007

Ms. Tracie Billington
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, California 94236-0001

**SUBJECT: COMMENTS REGARDING PROPOSITION 50 INTEGRATED REGIONAL
WATER MANAGEMENT IMPLEMENTATION GRANT PROGRAM ROUND 2
STEP 1 APPLICATION SCORING**

Ms. Billington:

The Northeastern San Joaquin County Groundwater Banking Authority (GBA) has worked diligently to develop a comprehensive plan to correct conditions of long-term groundwater overdraft in the Eastern San Joaquin County Region. Over two years the GBA has developed and adopted an Integrated Regional Water Management Plan (IRWMP) which outlines a progressive action plan for implementation of the Eastern San Joaquin Integrated Conjunctive Use Program. In addition, the GBA IRWMP describes benefits to neighboring regions through inter-regional partnerships and continued collaboration.

The GBA wishes to express disappointment in not being called back to participate in Step 2 of the Proposition 50 Round 2 Integrated Regional Water Management Implementation Grants. Despite what we feel is as solid an IRWMP as any out there, we understand and can appreciate the arduous task Department of Water Resources (DWR) and State Water Resources Control Board (SWRCB) staff has to thoroughly and objectively rank each and every IRWM grant application that is submitted. However, there is some question as to the DWR and the SWRCB interpretation of the scoring criteria and how it was applied to the GBA's IRWMP.

Attached are specific comments to the review notes provided by DWR and SWRCB staff. In addition we have requested that Mike Floyd, DWR Conjunctive Water Management Branch, set a meeting with DWR/SWRCB review staff and GBA Staff in the near future to further explore the interpretation and standards used to score the IRWM Program Grant Application. Feedback on previous grant applications has been very helpful, and we recognize that your comments and

Ms. Tracie Billington
COMMENTS REGARDING
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criticisms will only strengthen our ability to compete for future funds and at the same time help your staff to navigate future grant applications more efficiently and expeditiously.

Should you have any questions regarding the comments provided or on the activities of the Northeastern San Joaquin County Groundwater Banking Authority, please feel free to contact me at (209) 468-3089. Thank you for your consideration.

Sincerely,



for C. MEL LYTLE, Ph.D.
Water Resources Coordinator
Northeastern San Joaquin County
Groundwater Banking Authority

Attachment

ML:BN

c: Mike Floyd, Department of Water Resources Conjunctive Water Management Branch
Carolyn Lott, Center for Collaborative Policy
Northeastern San Joaquin County Groundwater Banking Authority
Board of Directors and Coordinating Committee
T. R. Flinn, Director of Public Works
Tom Gau, Chief Deputy Director

PIN: 10797 Applicant Name: Northeastern San Joaquin County Groundwater Banking Authority
Project Title: Eastern San Joaquin Integrated Regional Water Management Plan
Native Region: 5S Watershed: Sacramento-San Joaquin Delta County Name: San Joaquin
Funds \$7,000,000 Requested: Cost Match: \$11,800,000 Total Project Cost: \$18,800,000

Project Description: The Eastern San Joaquin IRWMP defines and integrates key water management strategies to establish protocols and a course of action for implementing the region's 2030 Integrated Conjunctive Use Program. No one project will meet the Fundamental Objective of providing water supply sustainability. The Plan describes the priority and phasing of a combination of several projects implemented over a wide geographic area. Integrated projects selected through a broad-based consensus process include water imports, demand management, and conjunctive use. High-priority projects that are ready to proceed include the Stockton Delta Water Supply Project (DWSP), a conjunctive use program that integrates surface water and groundwater management to supply up to 33,600 af/yr of treated surface water, which allow recapture of treated wastewater discharges in the Delta. The DWSP will protect and restore groundwater resources by pumping less from the region's overdrafted groundwater basin.

Q# Review Question

1. CONSISTENCY WITH DRAFT PLAN ELIGIBILITY CRITERION

Answer: NOT_APPLICABLE
Answer:

2. CONSISTENCY WITH MINIMUM PLAN STANDARDS

Answer: PASS
Answer: The adopted IRWMP addresses all of the minimum standards.

3. ADOPTED PLAN

Answer: 5
Answer: On July 25, 2007 the board of directors of the Northeastern San Joaquin County Groundwater Banking Authority approved resolution R-07-01 adopting the Eastern San Joaquin Integrated Regional Water Management Plan. The resolution is signed by the Chairman Board of Directors of the Northeastern San Joaquin County Groundwater Banking Authority. This IRWMP was adopted prior to August 1, 2007.

GBA Comment: No comment.

4. REGIONAL DESCRIPTION

Answer: 4
Answer: The IRWMP adequately describes the planning region and why the region is appropriate for regional water management. Numerous maps were provided, including those showing land use, water infrastructure, and political boundaries. Discussion of how population projections correlate with future water demand would have been helpful. Current water quality was discussed. Important ecological processes and environmental resources and social and cultural makeup of the region were either lacking or not clearly discussed or documented.

GBA Comment: Population projections are presented in Section 2.1.3 and come from the San Joaquin Council of Governments which is designated by federal law as the Metropolitan Planning Agency for the Region. Water supply projections have been taken directly from adopted Urban Water Management Plans which are also based primarily on population projections due to planned urban growth.

Important Ecological Processes pertaining to the environmental health of Eastern San Joaquin County are referenced in Section 3.4 Habitat Conservation and Watershed Management Planning. The HCP is an integral part of the IRWMP and is included by reference.

Social and cultural make-up of the Region as it pertains to Water Management is not something we felt was important to the overall IRWMP. We are still a little confused as to why this would be important in an IRWMP. Disadvantaged communities, industrial output, and housing and construction are described in Sections 2.3.2 through 2.3.4. Existing problems and potential impacts to disadvantaged communities were examined, but no issues or impacts specific to these communities were identified.

5. OBJECTIVES

Answer: 4
Answer: Criterion is fully addressed but is not supported by thorough documentation or sufficient rationale. Objectives are mentioned, within the framework of the plan purpose concepts in Section 5.4, but are not described in detail. A discussion of how they were determined was not included. The IRWMP covers water-related objectives and conflicts in multiple sections.

GBA Comment: Section 5 describes the tiering process used to logically progress through the IRWMP Framework from Problem Statement through to the purpose, objectives, values, and evaluation/prioritization criteria.

6. WATER MANAGEMENT STRATEGIES & INTERGRATION

Answer: 4

Answer: Criterion is fully addressed but is not supported by thorough documentation or sufficient rationale. The IRWM adequately integrates a wide range of water management strategies. Numerous strategies introduced, including some not mentioned in the California Water Plan. Reviewers could not locate a discussion on why the strategies that were deemed not applicable were excluded. Chapter 7 shows how integration of the strategies is accomplished in the projects, including a means of evaluating integration scenarios through performance modeling. A detailed discussion of the added benefits of integration of multiple strategies versus stand-alone strategies is missing.

GBA Comment: The strategies considered stem directly from the objectives of the IRWMP, which are directed at the development and implementation of the Integrated Conjunctive Use Program. How it was determined to narrow the focus of the IRWMP to the development of the Integrated Conjunctive Use Program (ICU Program) is directly linked to the tiering process explained in Chapter 5.

7. REGIONAL PRIORITIES

Answer: 5

Answer: Regional priorities are established through Chapter 5, IRWMP Framework, and discussed in a broader context in Chapter 7, including a project ranking methodology. Both short and long term implementation priorities are identified. Chapter 9, Management Action Plan, discusses how the regional priorities factor into the decision-making process and how priorities may be re-assessed by adaptive response in the periodic plan performance evaluation and update process.

GBA Comment: No comment.

8. IMPLEMENTATION

Answer: 5

Answer: Chapter 9, Management Action Plan, contains governance detail as well as the details of how implementation of the IRWMP will proceed and be ensured. Current and potential projects, project sponsors, status, and timelines are presented. Linkages and interdependences and economic and technical feasibility are discussed.

GBA Comment: No comment.

9. IMPACTS & BENEFITS

Answer: 3

Answer: Criterion is less than fully addressed and documentation and/or rationale are incomplete or insufficient. Regional and interregional benefits are described in the IRWMP. However, very little detailed information on the impacts was found. Discussion of potential impacts was mostly deferred until a IRWMP programmatic EIR is completed. Benefits to DACs are calculated as a function of the benefit to the greater region in which they reside. However, efforts to target DACs needs and issues and determine related impacts and benefits were not found.

GBA Comment: The GBA has developed a comprehensive list of performance standards and prioritize criteria which were used to evaluate ICU Program Alternatives (Chapter 7.10). Impacts and benefits are well covered in the IRWMP and will further be explored in the Program EIR and subsequent project-level EIRs.

Focusing on how to address the needs of DACs within the scope of IRWMP was thought of as premature and a distraction from the need to secure an addition 140,000 to 160,000 acre-feet per year just to mitigate conditions of groundwater overdraft including saline groundwater intrusion and operate the underlying basin in a manner that is consistent with the objectives of the IRWMP. Existing problems and potential impacts to disadvantaged communities were examined, but no issues or impacts specific to these communities were identified.

10. TECHNICAL ANALYSIS AND PLAN PERFORMANCE

Answer: 4

Answer: The criterion is fully addressed, but is not supported by thorough documentation or sufficient rationale. The IRWMP includes a discussion of technical methods, data, and modeling used in the selection of water management strategies. Based on current and historical data, alternative methods to achieve plan goals and objectives with varying management strategies were modeled. The IRWMP has means to monitor plan performance, potentially implement adaptive changes, and regularly update the IRWMP. Performance measures are briefly discussed. Data gaps are not discussed in sufficient detail, and impact on plan performance and details on how to address them are lacking.

GBA Comment: Section 9 Management Action Plan details the commitments the GBA has made to implement the IRWMP. The first few areas of commitment focus in on continued groundwater monitoring with emphasis on improving data management, saline intrusion and water quality monitoring, reporting, integration of land use planning with water supply planning, aquifer characterization, and modeling.

11. DATA MANAGEMENT

Answer: 4

Answer: The criterion is fully addressed, but is not supported by thorough documentation or sufficient rationale. Data management is not discussed in great detail in the main body of the IRWMP. The Applicant's 2004 Groundwater Management Plan provides a more extensive discussion on existing monitoring and data collection efforts. The detailed on how the Applicant's data management system will be used to disseminate data to stakeholders could be more detailed. The IRWMP did not address integrating data with statewide databases including GAMA and SWAMP.

GBA Comment: The IRWMP references the GBA Groundwater Management Plan which describes the San Joaquin County Groundwater Data Center, a repository for groundwater data collected throughout the San Joaquin County Region

and an interactive web-based publicly accessible GIS interface (www.sjwater.org). The GBA Groundwater Management Plan is an integral part of the IRWMP and is incorporated by reference.

The Eastern San Joaquin County Groundwater Basin was the first basin evaluated by the USGS in the GAMA program and data was provided to the USGS in that process. Chapter 4.5.6 describes the ongoing relationship between the USGS, DWR CWMB, and the GBA through a joint 5-year study of the Eastern San Joaquin Groundwater Basin including the GAMA program (page 4-64).

12. FINANCING

Answer: 4

Answer: IRWMP Chapter 9 contains a broad selection of potential mechanisms for financing projects, including bonds, grants, loans, and partnerships. Section 9.4 included a variety of financing options but did not indicate whether any of the options would be used specifically to finance projects. While the IRWMP contains a methodology for establishing and implementing financing plans, it does not describe a feasible program of financing for implementation. O&M support and financing are only generally discussed in the IRWMP.

GBA Comment: This criteria can not be met entirely by all project outlined in the ICU Program until they are further defined and have progressed farther towards implementation. Projects that are ready to proceed will be able to fully meet this criteria; however, the GBA did not realize that sufficient detail would need to be provided in the Round 2 Step 1 application.

13. RELATION TO LOCAL PLANNING

Answer: 3

Answer: Criterion is less than fully addressed and documentation and/or rationale are incomplete or insufficient. Chapter 3 contains a discussion of the numerous planning efforts of several entities within and surrounding the planning region including UWMPs, GWMPs and other regional planning efforts. While the IRWMP acknowledges those efforts, the level and means of ongoing coordination between them and IRWM implementation efforts is not discussed. A discussion of how plan implementation may relate to or impact other local planning efforts, including general plans of the cities and county, is missing. The Applicant describes how all projects come out of local plans, but they do not evaluate the relationship of the local supplies to the goals of the region.

GBA Comment: The member agencies of the GBA are stakeholders, proponents, or active participants in the activities described in Chapter 3. The GBA is also a forum for its member agencies to update each others activities and also discuss any potential for collaboration and expanded benefits.

Because the GBA includes several agencies with land use planning authority (City of Stockton, City of Lodi, and San Joaquin County as the San Joaquin County Flood Control and Water Conservation District), there has been an acknowledgement of these entities land use authority and adopted or pending general plan update land use information was used in determining the baseline and future spatial water/land use scenario as described in Chapter 4. Because these land use agencies are member agencies of the GBA, we would argue that the connection between land use and water supply planning is completely integrated and much more so than a regional agency who do not have land use agencies on their governing board.

IRWMP Chapter 3 describes the local planning agencies that were consulted and documents reviewed in preparation of the Plan. These include the Urban Water Management Plans for the cities of Stockton, Lodi, Manteca, Ripon, Lathrop, and Escalon, and for Stockton East Water District and the California Water Service Company. Groundwater Management Plans include those of Woodbridge Irrigation District, North San Joaquin Water Conservation District, Stockton East Water District, Central San Joaquin Water Conservation District, South San Joaquin Irrigation District, Oakdale Irrigation District, and the GBA plan for the Eastern San Joaquin County Groundwater Basin.

The IRWMP was developed in consultation with the Eastern Water Alliance (p.3-13), a JPA of three districts in the eastern County, on-going discussion and negotiation with the Mokelumne River Forum to develop extra-Regional projects with Amador and Calaveras counties, the southern Sacramento County South Area Water Council, and the sharing of information and participation in the Tracy Regional Groundwater Management Plan.

Also described in Chapter 3 is coordination with the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (HCP), the Calaveras River HCP, the Lower Mokelumne River Stewardship Plan, and the San Joaquin County and Delta Water Quality Coalition.

During IRWMP preparation, the planning departments of Lodi and Stockton were consulted, as was the San Joaquin County Parks and Recreation Department was engaged regarding siting recharge facilities in County parklands (e.g. Micke Grove Park). There are efforts underway to attempt to link these plans to incorporate water recharge, urban buffer, and habitat planning contemplated in the IRWMP to these local plans.

14. STAKEHOLDER INVOLVEMENT & COORDINATION

Answer: 4

Answer: IRWMP Chapters 1 and 9 discuss the stakeholder inclusion process. The IRWMP discusses how stakeholders were involved with plan development, including how they were identified, how they participate, and how they can influence decision making. Partnerships and state/federal coordination were discussed. The application documents in the application the process. However, the IRWMP does not specifically cite or explain how DACs were involved in the planning process.

GBA Comment: DACs are represented by San Joaquin County or either the City of Stockton/Lodi, because census tracts identified as disadvantaged fall within either a City Council or Supervisorial District. Each of the member agencies as a whole are not considered disadvantaged by the criteria set forth in the bond language: however, to say that DAC's are not represented is not true.

15. DISADVANTAGED COMMUNITIES - ENVIRONMENTAL JUSTICE

Answer: 6

Answer: The IRWMP identifies and describes the DACs in the region and suggests water resource issues are critical for all planning areas, including DACs. By addressing the entire planning area water resource issues, everyone including DACs benefits. However, a specific tie of DACs to water supply and quality improvements would have made for a stronger argument. The IRWMP includes a stakeholder involvement process, but DACs do not appear to be targeted and a mechanism to encourage their participation in the process is weak. DACs benefits are a designated performance measure of the IRWMP that can give added weight to projects that benefit DACs in the project evaluation and prioritization process. Environmental justice concerns appear to be reflected in the community values, but are limited to general statements. The IRWMP lacks a specific discussion of environmental justice issues in the region.

GBA Comment: As a general comment, there seems to be 7 of 13 points lost due to inadequate attention to disadvantaged communities. The daunting task of finding 140,000 to 160,000 acre-feet of addition water per year is somehow lost amongst the importance of involving and catering to the needs of disadvantaged communities. GBA member agencies struggle to keep water flowing to disadvantaged census tracts just as much as the struggle to keep water flowing to non-disadvantaged communities. If the plan focused on specifically improving the water supply of just disadvantaged communities, the IRWMP would not be able to focus in on the broader benefits and impacts of managing the underlying basin with the implementation of the ICU Program. It would be helpful if DWR and SWRCB staff could provide specific advice on how to meet DAC focused scoring criteria in the future.

Existing problems and potential impacts to disadvantaged communities were examined, but no issues or impacts specific to these communities were identified.

Environmental Justice issues are specifically scoped in the Eastern San Joaquin Integrated Conjunctive Use Program EIR. Although classically not statutorily required as part of the CEQA process, the GBA felt that the issue is important enough to formally address.

**Overall Review
Sheet Comments:**

Totals Numeric Scores by Grant Program:

Grant Program Title	Total Numeric Score
IRWM Implementation Grant, Round 2, Step 1 Program	55