



May 9, 2014

Via E-mail

Mr. Keith Wallace  
California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
P.O. Box 942836  
Sacramento, CA 94236

[Keith.Wallace@water.ca.gov](mailto:Keith.Wallace@water.ca.gov)

RE: Comment Letter - Draft 2014 IRWM Drought Grant Program Guidelines and Proposal Solicitation Package

Dear Mr. Wallace:

We represent a group of local agencies in Northern California whose service areas are within Alameda and Contra Costa counties which have a population of 2.6 million people in the East Bay Region of the San Francisco Bay Area. We are submitting this letter to urge the California Department of Water Resources (DWR) to consider removing the California Statewide Groundwater Elevation Monitoring (CASGEM) compliance requirement from the draft Proposal Solicitation Package (PSP) and draft Guidelines for the 2014 Integrated Regional Water Management (IRWM) Drought Solicitation Implementation Grant Program funded by Proposition 84. Our group recently held a conference call meeting with DWR staff on May 1, 2014 to discuss the issues related to CASGEM.

The draft PSP and Guidelines released in April 2014 state that CASGEM compliance is required for high and medium priority groundwater basins in order to be eligible for drought grant funding. Given that priority basin rankings were just released in January 2014 and are in draft form, and further given that the drought relief grant funding process is being expedited to respond to the current drought, we strongly urge that the CASGEM compliance requirement be removed from the PSP and Guidelines. It is our firm belief that more time is needed to develop plan(s) at the regional level regarding how best to meet the CASGEM program goals. Drought funds are best distributed to those projects that will result in the greatest benefit to the State, and many worthy projects and programs would be denied consideration if the CASGEM compliance requirement remains simply because agencies have not had time to develop approaches for CASGEM compliance after learning of basin prioritizations.

Also, it is our interpretation of sections 10933, 10933.5, and 10933.7 of the California Water Code relating to groundwater monitoring that there are steps that DWR must take prior to excluding entities from grant funding, and that those steps have not been followed in our case.

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On this basis, we once again ask that DWR consider removing the CASGEM compliance requirement until the groundwater basin priorities have been finalized, reasonable time is given to allow appropriate monitoring entities to step forward, and DWR has made determinations and notifications on which groundwater basins it must monitor.

The group of agencies that could be impacted in this East Bay Region includes the East Bay Municipal Utility District, Contra Costa County, Contra Costa Water District, and Zone 7 Water Agency. We have a number of drought relief projects that are ready to proceed that can immediately respond to the drought, which may not move forward without grant funding assistance. Given the severity of the drought and the additional time needed to address CASGEM compliance, we recommend that DWR consider all drought relief projects, with or without CASGEM compliance, to be eligible for drought funding.

Thank you for considering our specific comment. If you have any questions, please contact Michael Tognolini at (510) 287-0125 or [mtognoli@ebmud.com](mailto:mtognoli@ebmud.com).

Sincerely,



Alexander R. Coate  
General Manager, East Bay Municipal Utility District



Jerry D. Brown  
General Manager, Contra Costa Water District



G.F. Duerig  
General Manager, Zone 7 Water Agency



Michael Carlson  
Supervising Civil Engineer, Contra Costa County