East Stanislaus Regional Water Management Partnership
c/o City of Modesto
P.O. Box 642, Modesto, CA 95353

November 11, 2015

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

Dear Mr. Wallace:

On Thursday, October 29, 2015, the Department of Water Resources (DWR) announced the draft recommendations for funding awards for the 2015 Proposition 84 Implementation Grants. The East Stanislaus Regional Water Management Partnership (ESRWMP) is pleased to have received a draft award and thanks DWR for reviewing the grant application. However, the ESRWMP also believes there are areas in the application where additional points could have been awarded and hereby submits its comments on the recommended implementation grant awards. Specifically, after a careful review of DWR's evaluation of our implementation grant application, and with all due respect to the reviewers, we feel that our scores for the North Valley Regional Recycled Water Project (NVRRWP) are not reflective of the content of our proposal and would appreciate an opportunity for a second review of certain elements within it. We have prepared a written response, attached herewith, to the DWR review comments and respectively request that the Department review our response and consider adjusting the score for our application.

Furthermore, the ESRWMP does not understand why only 75% of the grant request was awarded, as the East Stanislaus Region's grant application was the highest scoring application in the San Joaquin River Funding Area and in all other Prop 84 grant funding rounds, a full award was made whenever possible. As such, we seek an explanation as to purpose of the partial award. We started the IRWMP process on our own, recognizing the importance of such planning, and have put in a significant effort to prepare this and other past grant applications because of the regional and statewide importance of the IRWM planning in our region. We are pleased to have received a draft award, but still believe that, as with past funding rounds, the full amount requested might have been awarded instead of 75%.

We request your sincere consideration of our response and a revision of our score.

Sincerely,

East Stanislaus Regional Water Management Partnership

Jim Alves
Associate Civil Engineer
City of Modesto
East Stanislaus IRWM Project Manager

East Stanislaus Region 2015 IRWM Implementation Grant Solicitation Application Evaluation Response Comments

The East Stanislaus Regional Water Management Partnership (ESRWMP) has comments on the evaluation of their 2015 IRWM Implementation Grant Solicitation application. These comments are summarized below.

Project Level Evaluation

North Valley Regional Recycled Water Project (NVRRWP)

Score 1: A score of 0 was given for Question 6, 'Does the applicant provide a description of the project that summarizes the major components and the intended purpose of the project?'

Response 1: To provide a thorough description of the project, the grant application includes a description of the anticipated physical benefits of the project, intended outcomes, and major physical components. A detailed discussion of the anticipated physical benefits for the NVRRWP is included in Attachment 2 of the grant application on pages 8 to 13. The physical benefits are quantified in Tables 2-2, 2-3 and 2-4.

The intended outcomes for the NVRRWP are equivalent to the claimed physical benefits (i.e. CVP supplies augmented with recycled water and recycled water to wildlife refuges) as described throughout Attachment 2. In addition, the Project Performance Monitoring Plan included on page 18 of Attachment 2 includes specific targets the NVRRWP intends to achieve.

Specific major physical components included in the NVRRWP are summarized on pages 16 and 17 of Attachment 2 under the section entitled "New Facilities, Policies, and Actions Required to Obtain Physical Benefits." The NVRRWP includes installation of pipelines and two pumps, and one standby pump.

Score 2: A score of 0 was given to Question 10, 'If applicable, does the applicant describe the potential adverse impacts of the project? If none, does the applicant properly explain why there are no impacts?'

Response 2: On page 17 of Attachment 2, a list and description of potential adverse physical effects is listed. As described, adverse impacts were evaluated in the project's EIR/EIS.

Score 3: A score of 0 was given to Question 12, 'Does the project provide a direct water-related benefit to a DAC?'

Response 3: Attachment 7 includes a map (Figure 7-2) that shows the majority (well over 25%) of the DPWD service area as being a DAC; as stated on page 1 in the 3rd paragraph, "...almost all of the DPWD service area is categorized as a DAC..."

The direct water-related benefit to the DACs within the DPWD service area are described on page 18 of Attachment 2. This discussion includes a description of the water-related need of the DAC (i.e. the ongoing drought and reduced CVP allocations have created a water crisis in the DPWD service area), as

well as how the project will address the need (i.e. the NVRRWP will deliver recycled water from the Cities of Turlock and Modesto to the DPWD service area, improving water supply reliability and augmenting the shortfalls from the District's CVP supplies). Pages 2 and 3 of Attachment 7 provide additional detail.