Santa Ana Watershed Project Authority

OVER 45 YEARS OF INNOVATION, VISION, AND WATERSHED LEADERSHIP

One Water One Watershed

AWRA INTEGRATED WATER RESOURCES MANAGEMENT AWARD

HARVARD KENNEDY SCHOOL'S TOP 25 INNOVATIONS IN AMERICAN GOVERNMENT

Thomas P. Evans
Commission
Chair

Celeste Cantú
General
Manager

Orange
County
Water
District

Western
Municipal
Water District

Eastern
Municipal
Water
District

San
Bernardino
Valley
Municipal
Water
District

Inland
Empire
Utilities
Agency

November 4, 2015

Mr. Keith Wallace
Program Manager
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236

Re: Proposition 84 IRWM 2015 Implementation Draft Grant Funding Recommendations Comments

Dear Mr. Wallace,

We wish to express our full support of DWR's draft recommendations for 100% funding, $64,267,686, of the Proposition 84 IRWM 2015 Implementation grant funding assigned to the Santa Ana Funding Area and IRWM for the Santa Ana Watershed Project Authority. We are pleased that DWR supports awarding the full balance of the Prop 84 IRWM grant funds assigned to the Santa Ana Funding Area to our project portfolio of three integrated multi-beneficial projects.

In review of the DWR scoring assigned to the grant request, however, we were very surprised and disappointed by the low score assigned to our grant application by DWR staff. Our grant application was thoroughly reviewed by our staff and project proponents and, in our view, fully compliant with the required documentation defined in the 2015 Grant Proposal Solicitation Package and deserved a much higher score. Based on our review of the DWR evaluation summary for our application in detail, we believe that several errors were made in the evaluation in which no points were given or assigned to the overall proposal and to individual projects that should have been.

Attached is a table that lists each scoring criteria question that we dispute and cites the specific location in our documentation in which the application addresses the criteria. We are clearly at a loss as to why no points were given to several items such as submittal of schedules, maps and deadlines which DWR claims we did not meet or include with no points assigned to them when the documentation is clearly present and included. We appreciate your DWR staff double checking this evaluation in light of this.

11615 Sterling Avenue, Riverside, CA 92503 • 951.354.4220
www.sawpa.org • www.sawpa.org/OWOW

Our organization takes great pride in the quality of its work and believed that this project portfolio consisting of three integrated regional projects reflects the very best of the intent and purpose of integrated regional water management and implementation.

We hope that you find these comments and suggestions helpful. If you have any questions regarding these comments, please let us know.

Sincerely,

Celeste Cantu
General Manager

2015 IRWM Solicitation - DWR Draft Funding Recommendations Analysis

#	Question	To Receive a Full Score Show	SAWPA Response	Projects
4	Collectively, do the Work Plan, Budget, and Schedule demonstrate that all of the projects will be completed by October 31, 2020?	A proposal where all projects will be completed by October 31, 2020.	The schedules, shown on pages 2-6 of Attachment 5, show all projects being completed early in Quarter 4 of 2020, which is October 31, 2020. The specific dates are listed on the left side of each page.	Orange County Sanitation District (OCSD), Riverside County Flood Control District (RC Flood), Santa Ana River Conservation and Conjuntive Use Program (SARCCUP)
6	Does the applicant provide a description of the project that summarizes the major components and the intended purpose of the project?	A description of the project that summarizes the: - anticipated physical benefits of the projects - intended outcomes, and - major physical components (i.e., what the project is installing, retrofitting, replacing, etc.)	The RC Flood project proponents discuss the physical benefits on page 3 of Attachment 2. For example, the San Jacinto River, Stage 4, Phase 1 Project describes: "installation of a river levee ... will provide all-weather access into and out of the San Jacinto Valley in western Riverside County by removing 967 acres and 445 structures from the San Jacinto River 100-year floodplain." The SARCCUP project proponents discuss the physical components of each of the pieces of their project on page 26 of Attachment 2 under the heading "New Facilities, Policies, and Actions Required to Obtain the Physical Benefits." They go into detail on the intended outcomes of the Project on page 24 of Attachment 2 under the heading "Basis for Estimation of Benefits."	RC Flood, SARCCUP
7	Is there a project map that shows the location of the project and the areas and water resources affected by the project?	A map of the project that includes the location of the project, the areas affected by the project, and the water resources affected by the project	All the required maps are shown on pages 5 through 8 in Attachment 2. There are two maps per project in order to show items such as the infrastructure to be installed, water bodies affected, and DAC areas in the project benefit zone.	OCSD, RC Flood, SARCCUP
9	Does the technical analysis support the claimed physical benefits?	A demonstration that the benefits were quantified correctly: 1. An explanation of project need 2. An explanation of without project conditions 3. A description of how benefits were derived For DAC projects that do not include construction, only #1 (project need) must be described.	The RC Flood project proponents specifically included responses to DWR's 3 sub-questions from Question #9. They stated how benefits were derived: "Physical benefits were estimated using a manual count of parcel information in the benefit area and aerial photography" on page 20 of Attachment 2. The SARCCUP project proponents also specifically answered those three sub-questions on pages 23 - 27 of Attachment 2.	RC Flood, SARCCUP
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?*	- A description of all potential adverse impacts of the proposed project. - A reasonable claim of no adverse impacts.	The RC Flood project proponent for the Beaumont Pond project specifically included the project's adverse impacts on page 22 of Attachment 2: "Adverse effects could include periods of very high flows, i.e., and rare storm events where flow will increase..." The SARCCUP project proponents address adverse impacts on page 31 of Attachment 2 under the section "Mitigating Any Potentially Adverse Impacts."	RC Flood, SARCCUP
11	Does the proposed project effectively address long-term drought preparedness?	A demonstration that the project contributes to sustainable water supply and reliability during water shortages and will achieve one or more of the following: - Promote water conservation, conjunctive use, reuse and recycling - Improve landscape and agricultural irrigation efficiencies - Achieve long-term reduction of water use - Efficient groundwater basin management - Establish system interties - Solutions that yield a new water supply such as seawater desalination Drought preparedness projects do not include drought emergency response actions, such as trucking of water or lowering well intakes.	The RC Flood project proponents discuss drought preparedness on page 22 of Attachment 2. For example, the Bautista Optimization Pond Project will "promote conjunctive use by allowing recharge of imported water supplies during wet years for extraction during dry years, better balancing supply and demand." The SARCCUP project proponents discuss drought preparedness on page 31 of Attachment 2. For example, the project proponents state that the "provision of rate tools to retail water agencies by the project proponents reflects Governor Edmund G. Brown's April 1, 2015 executive order."	RC Flood, SARCCUP

#	Question	To Receive a Full Score Show	SAWPA Response	Projects
12	Does the project provide a direct water-related benefit to a DAC?	- Proof that at least 25% of the area served by the project (by population or geography) meets the definition of a DAC. - A description of the water-related need(s) of a DAC. - Demonstration that the proposed project addresses the described need of the DAC.	Attachment 2 includes a description of a direct water benefit to DACs on page 34 for the RC Flood project proponents and 35 for SARCCUP project proponents. Attachment 7 includes a description of water supply need of DAC on page 2. Specifically the RC Flood project proponents state the "lack the resources and in-house expertise necessary to apply for grants that will make capital improvement projects more feasible." Attachment 7 includes a description by the SARCCUP project proponents of the water supply need of a DAC on page 4.	OCSD, RC Flood, SARCCUP
14	Is the proposed project the least cost alternative? If not, does the applicant sufficiently explain why it was selected instead of the least cost alternative?*	A completed Table 7 that explains why the proposed project is the preferred alternative even if it is not the least cost alternative	The RC Flood project proponents include Table 7 on page 44 of Attachment 2. The Bautista Optimization Pond project specifically outlines that Alternative B is $660,00 more expensive than the proposed project. The SARCCUP project proponents identify through Table 7 on page 45 that there is a lack of tributaries in the Santa Ana River to compare to the Santa Ana sucker restoration element to. The conjunctive use element uses a comparison of SARCCUP water to Carlsbad Ocean Desalination water to identify the least cost alternative.	RC Flood, SARCCUP
17	If applicable, does the Work Plan include a listing of required permits and their status, and the appropriate environmental documentation for the proposed project? (N/A = Yes)	- A list of required permits. - Description of appropriate environmental documentation. - Status of required permits and environmental documentation (as applicable). - If permits/environmental docs are not required, an explanation of why they are not required.	The SARCCUP project proponents list the applicable permits and environmental documentation on page 13 and page 14 of Attachment 3, see Tasks 4.2 and 5.1.	SARCCUP
21	Does the schedule demonstrate that it is reasonable to expect that the project will start construction/implementation by April 1, 2016?	- Reasonable timeframes for the proposed tasks - A project ready to start by April 1, 2016 (For construction projects, ready to start means construction bids will be awarded by April 1, 2016)	The OCSD project proponents specifically identify that construction will begin in April 2016 on page 8 of Attachment 5 under Task 12. The RC Flood project proponents discuss the various levels of accountability from the various departments within their agency on page 9 of Attachment 5. The SARCCUP project proponents discuss that although the project is large, its scope can be partitioned to different agencies that will have the lead on various components on page 10 of Attachment 5.	OCSD, RC Flood, SARCCUP
23	Is there sufficient detail in the Work Plan to demonstrate the proposed schedule can be met?	Supporting documentation for the proposed schedule that demonstrates the project could be implemented as promised.	The Work Plan in Attachment 3 goes into a high level of detail on the permits required, the percentage of work completed and the type and scope of work per task clearly indicating tha the project can be implemented as promised.	OCSD, RC Flood, SARCCUP