



November 13, 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 October 29, 2015, the Department of Water Resources (DWR) announced the draft recommendations for funding awards for the 2015 Proposition 84 Implementation Grants. On behalf of the Westside-San Joaquin Region, the San Luis & Delta-Mendota Water Authority (SLDMWA) hereby submits the following comments on the recommended Proposition 84 implementation grant awards and, more specifically, on the review of its application.

In 2014, the SLDMWA and its regional partners undertook an ambitious task of updating the 2006 Westside-San Joaquin Integrated Water Resources Plan (WIWRP) in conjunction with preparation of a 2014 Expedited Drought Grant application. On August 15, 2014, the updated WIWRP received approval from DWR that it meets all necessary requirements and guidelines. The Region intends to implement projects included in its adopted IRWMP and has sought funds through the IRWM Grant Program to assist local agencies in obtaining the funding required for project construction.

After a careful review of DWR's evaluation of our most recent (2015) grant application, and with all due respect to the reviewers, we believe our scores for many questions in both the Program Level and Project Level Evaluation do not accurately reflect the content of our proposal. As such, we request a second review of certain elements within it. We have prepared the attached response to the DWR review comments to assist a reevaluation.

The SLDMWA began IRWM planning in the late 1990's in response to diminishing water supply and reliability due to increasingly restrictive State and federal regulation. No part of the State has been so disproportionately impacted. Recognizing the importance of regional planning, the Westside-San Joaquin region has put significant effort into preparing numerous grant applications, our most recent being the 2015 Prop 84 implementation grant application. We are again disappointed by DWR's assessment and firmly believe that some of the scoring is in error, as demonstrated in our response comments.

We look forward to your reconsideration. Thank you in advance for your time and we stand ready to assist you in any way we can.

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Sincerely,

Westside-San Joaquin IRWM Region

A handwritten signature in blue ink, appearing to read 'Ara Azhderian', is written over a light blue rectangular background.

Ara Azhderian
Water Policy Administrator
San Luis & Delta-Mendota Water Authority

Westside-San Joaquin Region 2015 IRWM Implementation Grant Solicitation Application Evaluation Response Comments

The San Luis & Delta-Mendota Water Authority (SLDMWA) has comments on the evaluation of their 2015 IRWM Implementation Grant Solicitation application. These comments are summarized below.

Program Level Evaluation

Score: A score of 0 was received for Question 5, 'Does the proposal contain projects that assist the IRWM region in meeting the goals of the Human Right to Water Policy?'

Response: Per the PSP, the application is to include an '...explanation of how a project assists the IRWM region in meeting the goals of the Human Right to Water Policy (safe, affordable water for drinking, bathing, sanitation, and cooking for all). The application will receive one point for each project, to a maximum of 2 points (up to 2 points total).' This proposal should have received the maximum score possible of 2 points. As stated on page 1 of Attachment 6 under the Human Right to Water Policy section, "the non-administrative projects in this application all address the Human Right to Water Policy by creating new long-term water supplies for the Region and improving water quality; thereby helping to ensure that more potable supplies are available for equitable use around the region." The table on page 4 of Attachment 6 of our application clearly shows that Project 2, Project 3, and Project 4 will each address the Policy.

Project Level Evaluation

San Luis Water District Kaljian Drainwater Reuse Project

Score 1: A score of 0 was given for Question 16, 'Does the Work Plan include a project status that indicates the current stage of each task (e.g., % complete)?'

Response 1: To receive the full award for this question, the application is to provide a summary of work that has been completed to date. One point should have been awarded for this question. While the percent complete is missing for Task 9, the work summary for every task included in the project describes work completed to date and work that will be completed. In the case of Task 9, it says a Project Performance Monitoring Plan will be prepared and submitted to DWR. The percent complete is only an example of how to demonstrate work completed.

Score 2: A score of 0 was given to Question 22, 'Will the project be completed by October 31, 2019?'

Response 2: To receive a full award for this question, a schedule must be included in the application that demonstrates that the project will be completed by October 31, 2019. One point should have been awarded for this question. Construction of the project will be complete 3/23/2018 as shown on page 6 of Attachment 5 in rows 44 and 49.

Del Puerto Water District Orestimba Creek Recharge and Recovery Project

Score 1: A score of 0 was given for Question 8, 'Are the anticipated primary and secondary physical benefits of the project described and quantified with the units specified in Table 5?'

Response 1: To receive the full award for this question, a properly completed Table 5 for at least the primary and secondary benefit of each project must be included in the application. If the primary and secondary physical benefits were not clearly identified or quantified for each year of the project's lifecycle using the specific units provided in the instructions for Table 5, a response of "no" will be given. For DAC projects that do not include construction, benefits do not need to be quantified, but must be qualitatively described.

It is unclear why the full number of points were not awarded for this question. A completed Table 5 was included in the application.

Score 2: A score of 0 was given to Question 19, 'Are the costs presented in the Budget reasonable for the project type and the current stage of the project?'

Response 2: To receive a full award for this question, the application must include a budget that contains costs that are reasonably supported and not significantly higher or lower than industry standard. One point should have been awarded for this question. Pages 6 and 7 of Attachment 4 summarize the budget and justification for the cost estimates for each budget category. Costs are based on labor rates and estimated number of hours, consultant experience and fee estimates, and similar projects.

City of Newman LID Project for Water Quality Improvements and Water Conservation

Score 1: A score of 0 was given for Question 8, 'Are the anticipated primary and secondary physical benefits of the project described and quantified with the units specified in Table 5?'

Response 1: To receive the full award for this question, a properly completed Table 5 for at least the primary and secondary benefit of each project must be included in the application. If the primary and secondary physical benefits were not clearly identified or quantified for each year of the project's lifecycle using the specific units provided in the instructions for Table 5, a response of "no" will be given. For DAC projects that do not include construction, benefits do not need to be quantified, but must be qualitatively described.

It is unclear why the full number of points were not awarded for this question. A completed Table 5 was included in the application.

Score 2: A score of 0 was given to Question 9, 'Does the technical analysis support the claimed physical benefits?'

Response 2: To receive a full award for this question, the application must demonstrate that the benefits were quantified correctly. Specifically:

1. An explanation of the project need
2. An explanation of without project conditions
3. A description of how benefits were derived

Additionally, for DAC projects that do not include construction, only #1 (project need) must be described.

It is unclear why the full number of points were not awarded for this question. Answers to questions 1 through 3 address the three items required; see pages 2-29 and 2-30 of Attachment 2.