



Greater Los Angeles County

Integrated Regional Water Management

Leadership Committee

900 South Fremont, Alhambra, CA 91803

Gail Farber
Los Angeles County
Flood Control District

October 8, 2014

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City of Torrance

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City of Malibu

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Raymond Basin
Watermaster

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

Submitted Electronically: Zaffar Eusuff (Muzaffar.Eusuff@water.ca.gov)

Dear Mr. Eusuff:

COMMENTS ON FUNDING RECOMMENDATIONS FOR 2014 DROUGHT GRANT SOLICITATION FROM THE GREATER LOS ANGELES COUNTY REGION

The Greater Los Angeles County (GLAC) Regional Water Management Group (RWMG), wishes to sincerely thank the Department of Water Resources (DWR) for its recent recommendation to fully fund the GLAC Region's *IRWM 2014 Drought Solicitation Implementation Grant Proposal*. This expedited funding will support the GLAC Region in implementing a suite of 14 water management projects that provide immediate drought preparedness, increase local supply reliability, and increase the delivery of safe drinking water.

The 14 projects included in the proposal are critical to helping the GLAC Region mitigate current and future drought impacts in the area. Given the scale of the Region's population, economy, critical habitats, and ecological resources, water shortages experienced here can create massive impacts with few solutions that can be immediately implemented to mitigate them. In addition, the GLAC population has historically obtained over half of its water supply from areas of the State that are experiencing record dry precipitation conditions, making the Region extremely vulnerable to drought periods. This has increased the immediacy of local resource development and increasingly aggressive demand management programs, both of which will be implemented with the awarded Drought Solicitation funds.

We also wish to express our appreciation to the DWR for providing an opportunity to comment on the recently-released evaluations of the proposals. Although the GLAC Region is recommended to receive the full funding amount requested, our score of 27 out of 37 is troubling as we feel our proposal was deserving of a higher score. After reviewing the DWR scoring of the GLAC Region proposal, we have a few comments regarding some of the project-level scores, as well as some recommended considerations for grant application reviews in future rounds.

Comments on Project-Level Scoring

The GLAC Region would like to submit the following comments on scoring for the *IRWM 2014 Drought Solicitation Implementation Grant Proposal*. We feel that some of the yes/no designations for project-level scoring could be reconsidered and potentially reevaluated.

- Question 10: Does the applicant clearly explain how the proposed project will help alleviate the identified drought impacts?

The project-level evaluation scores indicate a “no” for three of the projects in the GLAC Proposal under this question. However, we feel strongly that the application does clearly address how each of the three projects will alleviate the drought impacts identified in Attachment 2 of the Proposal. Specifically, the Proposal indicates the following:

- Recycled Water Turnouts Project – Attachment 3 provides a description of how this project will offset 11,000 AFY of imported water for replenishment with recycled water, a local and more drought resistant source of safe drinking water supply. Additional details may be found on page 3-55 of the Proposal.
- Be a Water Saver Conservation Program – Attachment 3 provides an explanation for how this conservation program will ensure immediate drought preparedness by reducing potable water use by 500 AFY, 393 AFY of which would offset less-reliable imported water supplies. Additional details may be found on page 3-81 of the Proposal.
- West Coast Basin Barrier Project Unit 12 Injection and Observation Wells Project – Attachment 3 explains that this project will help alleviate drought impacts by increasing the capacity to inject additional recycled water, a locally-generated resource, into the West Coast Basin Barrier. The project improves the reliability of the local groundwater supply by directly increasing the recharge of groundwater supplies and by improving the reliability of the

WCBB to prevent seawater intrusion into the local aquifer. Additional details may be found on page 3-119 of the Proposal.

- Question 14: Does the technical analysis support the claimed physical benefits?

All 14 projects in the GLAC Region Proposal received a “no” for this question. However, we feel strongly that all the appropriate information, justification, analysis, and documentation were provided in the Proposal, and that it was sufficient to support each of the physical benefits claimed. Our position on the scoring for this question is based on the following points:

- The technical analysis tables in Attachment 3 for each project included a description of the technical basis for each project (including reference documents supporting the physical benefit claims); explanations of recent and historical conditions that provide background for the physical benefits; estimates of without-project conditions; descriptions of the methods used to estimate physical benefits; identification of all new facilities, policies, and actions required to attain the physical benefits; and descriptions of any potential adverse physical effects.
- All sources of information and references used for the technical analysis were fully documented in the Attachment 3 tables and were provided in part or in full in PDF format at the end of Attachment 3. For example, the technical basis and methodologies used to claim the secondary physical benefits for energy usage and greenhouse gas reduction were listed in every table that claimed these benefits, along with the references used to calculate these physical benefits. The reference documents for these benefits were also included in the Proposal.
- Additional details related to the technical analyses for both primary and secondary physical benefits may be found in the tables on pages 3-11 through 3-14, 3-23 through 3-26, 3-34 through 3-36, 3-47 through 3-53, 3-61 through 3-64, 3-74 through 3-79, 3-90 through 3-93, 3-101 through 3-103, 3-112 through 3-116, 3-125 through 3-128, 3-137 through 3-139, 3-147 through 3-150, 3-160 through 3-162, and 3-172 through 3-174.
- The level of technical analysis was considered reasonable considering the size of the projects and the types of physical benefits claimed, as indicated by 13 out of 14 of the projects receiving a “yes” on Question 13.

- Question 21: Are the costs presented in the Budget reasonable for the project type and the current stage of the Project?

The scoring results indicate a “no” for two projects in the GLAC Region Proposal under this question. However, we feel strongly that the application does present costs that are reasonable for the type and current stage of these two projects.

- Mission Wells Improvement Project: This is the only well restoration project in the proposal that received a “no.” All components of the budget are explained in detail in Attachment 5 and the level of detail provided is reasonable considering it is a planning stage project based on planning level costs. Additional details may be found on page 5-4 of the Proposal.
- Terminal Island Water Reclamation Plant (TIWRP) Advanced Water Purification Facility and Distribution System Expansion Project: This project received a “no” despite a high level of detail being provided in the write-up portion of the Attachment 3 project justification and in Attachment 5. The level of detail provided is reasonable considering it is a design-level project based on actual costs for planning activities and 60 percent design-level costs for construction/implementation. Additional detail may be found on page 5-6 of the Proposal.

Recommended Considerations for Future Grant Application Rounds

The GLAC Region would like to respectfully submit the following recommendations for your consideration in future rounds of grant funding. We feel that it is important for us to participate and provide feedback as a part of the Integrated Regional Water Management (IRWM) community to help ensure the most effective programs possible.

- Detailed scoring rationale - With regard to the overall format of the 2014 IRWM Drought Grant Solicitation Application Evaluation Summary, we appreciate that the DWR has provided project-specific scoring information; however, in future rounds we request that the DWR also provide a written guidance on how to obtain full scores for each rating category. This information would add transparency to the DWR scoring process, help us to understand how the DWR applies the criteria, and assist regions to better meet the objectives of grant funding initiatives.
- Department of Water Resources meetings - We recommend that the DWR consider implementing a step in the grant review process whereby applicants have an opportunity to meet with the DWR to discuss any questions or issues with their proposals. Allowing applicants to provide clarification and input to the DWR regarding their proposals is important to ensuring that proposals are fairly scored in a consistent manner across the State.

“Address the water resources needs of the Region in an integrated and collaborative manner.”

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The GLAC Region would like to commend the DWR for implementing a streamlined grant application approach for the 2014 Drought Solicitation and to encourage this approach for future rounds of IRWM funding. We would also like to request a discussion with the DWR to better understand the process behind the project-level scoring so that we can use this knowledge to better address the objectives of future DWR grant funding opportunities.

We greatly appreciate the open process initiated to fund IRWM projects for the State of California and again express our thanks for the recommended award to the GLAC Region. We look forward to working with the DWR to implement this suite of important and innovative water management projects.

If you have any questions, please contact me at (626) 458-4309 or tgrant@dpw.lacounty.gov or your staff may contact Ms. Virginia Maloles-Fowler at (626) 458-4354 or vmfowler@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works



TERRI M. GRANT
Program Manager
Integrated Regional Water Management
Greater Los Angeles County IRWM Region

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cc: GLAC IRWM Leadership Committee Members

"Address the water resources needs of the Region in an integrated and collaborative manner."