



**EASTERN SAN JOAQUIN COUNTY
GROUNDWATER BASIN AUTHORITY**

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KEN VOGEL
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SECRETARY

October 8, 2014

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

**SUBJECT: REQUEST TO RECONSIDER SCORING AND DISQUALIFICATION
PROPOSITION 84 DROUGHT 2014 GRANT SOLICITATION**

Dear Mr. Eusuff:

The Eastern San Joaquin County Groundwater Basin Authority wishes to protest the scoring and disqualification of its Proposition 84 2014 Drought Grant application.

The San Joaquin County Flood Control and Water Conservation District (District) filed to become a designated California Statewide Groundwater Elevation Monitoring (CASGEM) entity in 2010. Subsequently, the District has had extensive interactions with the Department of Water Resources' (DWR) staff to conform the District's 400+ well monitoring program to the evolving CASGEM standards. During Roundtable of Regions conference calls, DWR staff indicated that the Eastern San Joaquin Region application would be considered, providing progress was being made to become a CASGEM designated agency prior to application submittal. Contrary to this conversation, the application was disqualified due to California Statewide Groundwater Elevation Monitoring non-compliance. The District is requesting that DWR consider reversing this decision, as well as reconsider the draft scoring.

There appears to be inconsistencies and possible oversights in the scoring that resulted in an overall lower score. The San Joaquin County Flood Control and Water Conservation District's analysis, which includes the draft scoring and requested adjustments, is attached.

If you would like to discuss these issues further, please contact me at (209) 953-7460.

Sincerely,

BRANDON W. NAKAGAWA
Water Resources Coordinator

BWN:MLH:mk
WR-14J007-M1

Attachment

GBA MEMBERS

CALIFORNIA WATER SERVICE COMPANY
CENTRAL DELTA WATER AGENCY
CENTRAL SAN JOAQUIN
WATER CONSERVATION DISTRICT
CITY OF LODI
CITY OF STOCKTON
NORTH SAN JOAQUIN
WATER CONSERVATION DISTRICT
STOCKTON EAST WATER DISTRICT
SAN JOAQUIN COUNTY
FLOOD CONTROL & WATER CONSERVATION
DISTRICT
SOUTH DELTA WATER AGENCY
SOUTH SAN JOAQUIN IRRIGATION DISTRICT
WOODBIDGE IRRIGATION DISTRICT
SAN JOAQUIN FARM BUREAU FEDERATION
ASSOCIATE MEMBER

Discussion of Draft Scoring for 2014 Eastern San Joaquin County Groundwater Basin Authority* Drought Grant Application

Question	Points Available	Points Awarded	Rebuttal	Requested Additional Points
<p>Q.1. Does the Proposal clearly demonstrate the regional water management impact(s) due to the 2014 drought or any anticipated impacts if the drought or dry year conditions continue into 2015?</p>	5	<p>1 point -- Demonstrates very low regional drought impacts or less than clearly demonstrated low regional drought impacts</p>	<p>Six drought-related impacts are described in Attachment 2: Risk of not meeting drinking water demands; Risk of not meeting agricultural water demands; Resumption of historical Groundwater basin overdraft; Increased crop water demands; Saline water migration; and Surface water curtailments. Surface water deliveries have been reduced, mandatory rationing is required, and additional groundwater is being pumped from the historically overdrafted groundwater basin. If the drought continues into 2015, additional surface water curtailments are expected. Voluntary and mandatory water conservation efforts are described. The Region will experience at least four of the impacts listed on p.28 of the PSP -- this is a "High" drought impact according to the table on p.28 and should have been awarded 4 points.</p>	3
<p>Q.12 Are the anticipated primary and secondary physical benefits of the project described and quantified?</p>	1	<p>0.25 point - No credit given to Projects 1, 2, 3</p>	<p>Two or more physical benefits are described and quantified for all projects. Three benefits are quantified for Project 1 (Tables 5.1a, 5.1b, 5.1c). Two benefits are described and quantified for Project 2 (Tables 5.2a, 5.2b). Two benefits are described and quantified for Project 3 (Tables 5.3a, 5.3b). Credit is given only for Project 4, which provides the same benefits and quantification methods as Projects 1, 2, and 3.</p>	0.75
<p>Q.14 Does the technical analysis support the claimed benefits?</p>	2	<p>1 point -- No credit given to Projects 1 & 2</p>	<p>Project 2, a tailwater reuse project, is modeled on a similar District project that has been in operation for the last 2 years -- the water and energy savings performance is expected to be proportionally the same as this existing project -- this is clearly stated in Attachment 3 (1 of 8) and documented in Attachment 3 (3 of 8) and Attachment 3 (4 of 8). Project 3 (an on-farm water conservation program) is a continuation of an existing successful program -- the continued benefits are expected to be similar to the existing program -- the performance of the existing program is clearly stated in Attachment 3 (1 of 8) and documented in Attachment 3 (6 of 8, 7 of 8, and 8 of 8).</p>	1
<p>Q.16 Does the applicant discuss the necessary tasks that will result in a completed project?</p>	1	<p>0.25 point - No credit given to Projects 1, 2, 3</p>	<p>A complete listing of tasks, a description of work to be performed, and deliverables is provided for each project within the page limitation provided. The DWR-requested work summary was explicitly not to include a lengthy explanation of the project. The identically formatted summary for Project 4 was found acceptable by reviewers.</p>	0.75

Discussion of Draft Scoring for 2014 Eastern San Joaquin County Groundwater Basin Authority* Drought Grant Application

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Q.17 Do the tasks included in the scope of work include appropriate deliverables?	1	0.75 points -- No credit given of Project 4	A complete listing of tasks, a description of work to be performed, and deliverables is provided for each project within the page limitation provided. Deliverables for Project 4 are identified in a tabular format similar to the other three projects.	0.25
Q.21 Are the costs presented in the Budget reasonable for the project type and the current stage of the project?	1	0.5 points -- No credit given of Projects 2, 3	Costs presented in Attachment 5 for Projects 2 & 3 are based on contractor construction estimates. These detailed estimates were not requested by DWR, but were offered to DWR if tentatively awarded grant funding.	0.5
Q.23 Does the schedule demonstrate that it is reasonable to expect the project will start construction/ implementation by April 1, 2015?	1	0.75 points -- No credit given of Project 3	Task 10.3 of Attachment 6 (Schedule) for Project 3 clearly indicates that installation of the project will start by December 31, 2014.	0.25
Q.24 Does the application describe the steps necessary to ensure the proposed schedule can be met?	1	0.25 point - No credit given to Projects 1, 2, 3	A discussion of the reasonableness of the schedule for each project is provided in Attachment 6. Project 1 is based on a contractor contract and confirmed availability of City resources. Project 2 is based on the experience for constructing a very similar project two years ago. Project 3 is based on an existing program that was suspended for lack of funding -- the project implementation can be resumed immediately upon funding becoming available.	0.75
TOTAL REQUESTED ADDITIONAL POINTS				7.25
CURRENT SCORE				25.75
REVISED SCORE				33

* Submitting agency is misidentified as "Northeastern San Joaquin County Groundwater Banking Authority in the draft DWR grant score sheet

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