

Comments



CALIFORNIA URBAN WATER AGENCIES

March 2, 1997

Mr. Rick Woodard
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Overall
CALFED
Project
- outside source
of funding
not assured

CUWA's Comments on the CALFED Criteria for Project Implementation

Dear Rick:

The California Urban Water Agencies (CUWA) appreciates the opportunity to provide comments to CALFED on the draft criteria for evaluating the early implementation projects. We strongly urge CALFED to consider funding some of the early implementation projects that will improve water quality conditions in the Sacramento and San Joaquin rivers and the Delta. CUWA has reviewed the evaluation/prioritization criteria proposed by CALFED staff and we offer the following recommendations.

Water
Quality
Projects
(Project
Selection)

General Recommendation

If CALFED staff are to evaluate, prioritize and select projects from all the common programs in a way that stakeholders are confident in, staff must establish a process that is explicit, justifiable and consistent. CUWA suggests that CALFED staff:

1. Reformat criteria into the following evaluation groupings: a CALFED objectives group; a common program objectives group and a project documentation group (attached outline).
2. Establish consistent, numeric ranking scales for each criterion. For example, a ranking scale for the "benefit/cost ratio" criterion might award a project with a b/c of 3 or greater a rank of 5 (highest priority), while a project with a b/c of less than 0.5 would have a rank of 1 (lowest priority) and
3. Clearly define each criterion and the ranking process used to evaluate each project.

The recommended changes to the criteria are intended to facilitate and standardize the evaluation of a project and to prioritize its comprehensive value to the beneficial uses of the Bay-Delta.

Specific Recommendations

1. Add a criterion under "Common Program Objectives" grouping to measure a project's "Capacity to achieve numeric program objectives". This is intended to emphasize the need for project proponents to quantify the benefit their proposed project will have.
2. Add a criterion under "Common Program Objectives" grouping to measure a project's "Ease of monitoring, quantifying and interpreting results". This is intended to favor projects that generate unequivocal results.
3. Add a new category, "Regulatory Analysis/Support" under "Project Documentation" grouping and a new criterion, "Does not satisfy mitigation or other regulatory requirements of project proponent". This is intended to exclude or give a low priority to projects that are mandated under regulatory programs, to avoid diverting CALFED funds to support projects that individual parties are required to undertake to meet their regulatory responsibilities.
4. There should be some minimal level or percent of matching funds provided by the project proponent.

Highest priority should be given to meeting the CALFED Solution Principles and Program Objectives.

CUWA appreciates the opportunity to comment on the draft criteria. Please call me if you have any questions on our comments.

Sincerely,



Byron M. Buck
Executive Director

Attachment

ATTACHMENT Proposed "Regrouping" of Project Evaluation Criteria

- I Group 1 - CALFED Objectives Group
 - A. Provide good water quality for all beneficial uses
 - B. Improve/increase aquatic and terrestrial habitats and improve ecological functions
 - C. Reduce mismatch between water supplies and current/projected needs of beneficial uses
 - D. Reduce risks

- II Group 2 - Common Program Objectives
 - A. Capacity to attain numeric program objectives^{1,2}
 - B. Time to implement
 - C. Ease of monitoring, quantifying and interpreting results²

- III Group 3 - Project Documentation Group
 - A. Engineering Analysis/Support
 - B. Environmental Analysis/Support
 - C. Economic Analysis/Support
 - 1. Benefit/Cost Ratio
 - 2. Cost Sharing Availability
 - D. Regulatory Analysis/Support
 - 1. Does not satisfy mitigation or other regulatory requirements of project proponent²
 - E. Partnerships/Commitments
 - 1. Federal
 - 2. State
 - 3. Local
 - 4. Private²

¹This assumes that all common programs will have quantitative objectives/goals as the drinking water program does.

² New criteria to draft Criteria for Project Implementation