

RECLAMATION

Managing Water in the West

Public Comments on Draft Title XVI Criteria Specific Comments



October 15, 2010

Criteria Section (March 2010 Draft)	Comment submitted by	Full Text of Comment	Reclamation's Response
Section 1 Water Supply	Association of California Water Agencies	Rather than singularly focusing on 'reducing' water supplies, also recognizing importance of 'stretching' water supplies.	See revisions to Section 1, which has been separated into two sections (Stretching Water Supplies and Contributions to Water Supply Sustainability)
	Contra Costa Water District	Scoring under the Water Supply Criteria should consider the fate of the wastewater to be recycled and should only consider the net water supply generated as opposed to the gross amount delivered. Projects that recover or reuse wastewater that was formerly being discharged to a salt sink should receive a higher score under this category than a project that recycles wastewater that is being discharged back to a source of water (where reused by downstream diverters) or wastewater that is currently providing a beneficial use (i.e. preventing saltwater intrusion within an estuary that serves as a drinking water source, or naturally recharging a groundwater basin). Recycled water derived from wastewater discharged to a waterbody other than a salt sink does not necessarily generate new water supply. The actual water supply generated by a recycled water project needs to be carefully examined taking into consideration all of the effects of the use and discharge, and only the amount of new water supply generated by the project should be considered. Improperly evaluated water supply benefits can cause federal dollars to be misapplied to projects with net water supply benefits that are not what they appear to be based on gross amounts delivered.	Comments noted that some Title XVI projects result in important water management even where the amount of water that will result from a particular project is relatively small. These criteria are intended to provide consideration for project phases based on not only the number of acre-feet of water expected to be made available, but also based on the project sponsor's description of other ways that the project will reduce demands or postpone development of new supplies. Other comments suggested that the criteria should measure reductions in demand on non-Federal supplies as well as Federal supplies. In response, criteria have been revised to ask project sponsors to describe reductions in demand on both Federal and non-Federal supplies. Note that reduction in demand on Federal water supplies is a specific consideration for Title XVI projects under P.L. 102-575 and amendments and remains an important program goal.
	Eastern Municipal Water District	In light of the current dire water situation in the Western states, EMWD does not think it is appropriate for federal water supply to be given additional points or priority. EMWD requests that paragraph 1.(b) be eliminated from the criteria.	
	Metropolitan Water District of Southern California	Water Supply criteria should also address a project's ability to provide water supply during shortage conditions and peak demand periods.	
	Orange County Water District	Currently this criterion only includes how a project impacts demand reduction on federal water supplies. The benefits derived from non-federal water demand reduction is important to addressing water scarcity and should not be completely excluded from consideration. Therefore OCWD recommends that this criterion be expanded to include how a project impacts demand reduction on non-federal water supplies.	To highlight the specific concerns a project phase may be intended to address, this new section has been broken out from the previous "Water Supply" section of the criteria.
	Public Utility District No. 1 of Chelan County	Recommend adding a criterion (f) to recognize the transferability of the technology to be utilized. Points should be considered for emerging technologies with broad applications that can be applied to other locations.	One comment suggested that credit should be given to projects that will save water in a specific geographical area. Under the revised criteria, project sponsors will be asked to describe the specific water supply concerns that may be addressed by a particular project phase. However, to ensure fairness to potential applicants across the West, no specific geographical areas are referenced in the criteria.
	San Diego County Water Authority	Increase points for 'Water Supply' from 50 to 55, in light of diminished snow pack levels and continuing drought conditions....also include a bullet that special consideration will be given to a region that is under, and has adopted, mandatory drought restrictions.	
	Bay Area Recycled Water Coalition	There are five sub-criteria under water supply. This section would benefit by providing a breakdown of the points allocated to each.	The criteria have also been revised to provide additional consideration for projects that make water available during periods of drought or shortage, in response to comments received.
	City of San Jose	Expand the criteria for Water Supply to adequately acknowledge the ability of projects to stimulate additional water reuse on a local, regional and national basis. As written the greatest consideration is given to the amount of recycled water produced by a given project. While the unit cost of a project is acknowledged in the Economics criterion (20 points), there is no consideration given to the ability of a project to stimulate future reuse as, for example, when a project introduces recycled water to an area for the first time, or when the infrastructure for a system is constructed that is expandable to meet future needs. In addition to the amount of water produced initially, greater weight should also be given to the ability of a proposed project to support future reuse.	One comment includes the observation that small projects may be at a disadvantage to larger projects under the criteria. Note that the criteria for funding of construction activities ask project sponsors to provide information about specific project phases, rather than information about a larger authorized Title XVI project. Assessment of project phases is intended to put larger and smaller projects on similar footing, among other aims.
NRDC	This criterion should also seek information from applicants regarding the extent to which water efficiency and conservation measures are being maximized in the area where the project is proposed. Areas that have strong conservation and efficiency measures in place should be given priority over those that do not.		

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Section 1 Water Supply (continued)	Bay Area Recycled Water Coalition	(a) Asks for the acre-feet of water to be made available upon completion of the project or phase. This appears to favor larger projects over smaller projects. This favoritism does not seem appropriate, as several smaller projects could cumulatively equal one larger project (in both acre-feet of yield and overall cost). Please eliminate this criterion, or explain the ranking rationale for this question, and consider whether this question should include some measure of the ultimate potential yield that the project will support (i.e., what is the ultimate/future yield that project is designed to provide?)....Many times those smaller projects are able to be implemented quickly and should be incentivized.	
	Bay Area Recycled Water Coalition	(b) How is Federal Water Supply savings weighted against local water supply savings, and direct vs. indirect savings? Within the Bay-Delta, there are direct savings as well as indirect savings that can be realized by contractual entitlement transfers from a project sponsor to another agency to offset their Delta water use.	
	Bay Area Recycled Water Coalition	(c) BARWC suggests that a higher point allocation be given to projects that reduce diversions from natural watercourses or aquifers that are currently in distress, such as the California Delta or groundwater aquifers that have declining levels.	
	Bay Area Recycled Water Coalition	(e) 'Performance measures' is unclear. Does Reclamation have established measures for Title XVI projects or is it the responsibility of the project sponsor to recommend performance measures with the application? If so, please state the performance measures or provide a document reference.	
	WaterReuse Association	In paragraph (b), a very interesting question is posed: 'How significantly will the demand on existing water supplies be reduced?' while the criterion to target impacts on Federal water projects is laudable, WaterReuse questions whether water agencies really reduce demand on existing Federal projects, or stretch available supply from Federal water projects through implementation of water recycling projects. It is doubtful whether any water agency would build a recycling project and then give up its Federal water rights....We recommend that the criterion be expanded to address any and all projects that will reduce water consumption on Federal or nonfederal facilities. It is also unclear whether conjunctive use projects that rely on Title XVI would be considered a positive attribute given the criterion specifying the reduction on water withdrawals. It is recommended that such activities be considered as priorities and not detrimental to a project's feasibility for assistance.	
	Pajaro Valley Water Management Agency and City of Watsonville	Title XVI is a water supply program that focuses on reducing the demand of water on existing surface and ground water sources. Evaluating a project based on the potential volume (acre-feet) of recycled water produced would express this core goal during an evaluation. Instead, we would recommend that the scoring of this criterion be based on the percent of total regional demand that will be met by the project's recycled water.	
	Pajaro Valley Water Management Agency and City of Watsonville	Evaluating a project based on the 'percent of federal water supplied' implies that project sponsors are responsible for meeting the Bureau of Reclamation's federal water supply quota. There should be some clarification that the project's water supply is being evaluated as a percent of federal water entitled, rather than 'percent of federal water supplied'.	
	Pajaro Valley Water Management Agency and City of Watsonville	An additional criterion should be added to capture the value of projects that satisfy an unmet federal entitlement. Since such projects prevent future demands on over drawn systems, such as the Central Valley Project, they would encourage sustainability and independence. Therefore, projects that satisfy an unmet federal entitlement should be the only projects awarded full credit.	
	Southern Nevada Water Authority	Subsection (e) appears to be more of a statement that duplicates (a)-(d) and would seem to add little to the determination of project worth. The Authority recommends deletion of this criterion as it is duplicative and confusing.	
	Will & Carlson, Inc.	This section strongly recommends my advice on the need to have the project integrated with the state water plans.	
Will & Carlson, Inc.	There is nothing specific here with regard to how a project can integrate water efficiency improvements. You use words – “reduce, postpone, eliminate” – It seems like you are encouraging the burden be placed on someone else or in some future time, and fails to reward comprehensive planning.		

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	Will & Carlson, Inc.	Identify who actually says [it should be the state] that the project will accomplish the objectives listed above?	
	Will & Carlson, Inc.	What if the supply, in (c), is actually a tradeoff in quality? Or actually increase diversions into natural watercourses or previous withdrawals?	
	Will & Carlson, Inc.	What appears clearly to be missing here is the concept of use of water being developed for water supply -which is a part of that NAS study that is also being missed.	
	Will & Carlson, Inc.	There is also a social-justice aspect that wasn't raised in the Draft Funding Criteria: who will be receiving the water? How will the benefits of this science be shared?	
	Will & Carlson, Inc.	There doesn't seem to be an accounting for utilizing new technology and methods in this section, and getting the benefit of points.	
Section 2 Title XVI Project Completion	Association of California Water Agencies	If the intent is to reduce the backlog of existing projects, awarding more than 30 points would accelerate that process.	See revisions to Section 2, which has been separated into two sections (Progress Toward Completion of an Authorized Title XVI Project and Readiness to Proceed)
	Eastern Municipal Water District	EMWD recommends increasing the number of possible points for projects that are closer to full Federal funding levels. Projects near completion are closer to actually producing water and reducing imported water demands than new start projects are, and will bring Reclamation closer to its goal of developing water resources. The goal should be to reduce the number of projects on the eligibility list. EMWD recommends increasing the number of possible points for Title XVI project completion to 40.	Criteria have been revised to separate readiness to proceed and progress toward completion of a Title XVI project into two separate categories, in response to comments that it was confusing to include those two sub-categories under one heading.
	Metropolitan Water District of Southern California	Title XVI project completion criteria should address the two year completion requirement. At a minimum, a schedule of construction activity should be included to access feasibility and compliance. In the event project sponsors are subsequently unable to meet requirements, are there any adjustments after the fact? Additional information to address readiness to proceed could include mandatory use ordinances in effect, commitment letters from prospective recycled water customers, public support or governing board/third party endorsements for proposed projects.	Some comments note confusion between eligibility requirements and this section. To clarify, a project phase may be proposed for funding prior to completion of environmental compliance. No funding will be awarded, however, until compliance with the National Environmental Policy Act and other environmental clearances has been obtained. Under this criterion section, the construction schedule for the proposed project phase will be assessed by reviewers, including consideration of any outstanding environmental compliance measures.
	Orange County Water District	While it is important to address the current backlog of Title XVI projects, it is critical to incorporate flexibility into this criterion by facilitating opportunities for new, 'ready-to-go' projects that can provide comparatively fast relief to their respective communities. In regions where extended drought causes sustained negative economic and public health impacts, new projects not among the backlog may address these issues in a more timely manner. Therefore, OCWD recommends that greater consideration be given to the extent to which the project is ready to proceed. Moreover, OCWD believes that this criterion should explicitly include new projects will be considered and awarded points based upon their readiness to proceed.	
	San Diego County Water Authority	Reduce points from 30 to 20 points to accurately reflect for example, that regional, interagency projects which will ultimately result in greater recycled water use in the long run may take more time to design and construct. They should not be penalized points-wise. In addition, the scoring criteria should give preference to earlier dates of authorization.	
	Water Replenishment District of Southern California	Expand description to clarify how this criteria will be used to judge relative eligibility of projects. Is it simply that projects mid-way through (or in later phases) would rank higher than those just in the planning phase, or does USBR have other considerations in mind?	
	Bay Area Recycled Water Coalition	It appears this section should be relabeled or include the term 'Readiness.'" "BARWC suggests increasing the points allocated to the 'readiness' criterion. The point allocation or weighting should be designed to ensure that a project that has high marks in all of the non-readiness categories - but cannot be completed in two years - does not end up with a higher score than a project that is ready to be constructed. This avoids awarding funds to projects that will not be able to be constructed. This avoids awarding funds to projects that will not be able to expend them within the predetermined timeframe for the funding opportunity.	

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	Natural Resources Defense Council	This criterion inquires in part into whether the project is ready to proceed. Yet a project is not eligible for funding in the first place unless it 'can be commenced in FY 2011 and completed within 24 months.' Accordingly we believe fewer points should be awarded for this criterion, given that projects that are not ready to proceed will not be eligible for funding in the first place. Specifically, this criterion should be awarded no more than 10 points and should be viewed more like a 'tie-breaker' between projects that meet the Draft Criteria's more substantively important factors such as the project's energy footprint or ability to improve groundwater.	
	Bay Area Recycled Water Coalition	(a) How does previous funding affect the points given? The first paragraph implies that if funding will move the project off the 'backlog' (e.g. satisfy the federal funding share), it will get more points. Is this a correct interpretation? Based on earlier language regarding ineligibility of expenditures prior to FY 2011, this is confusing.	
	Bay Area Recycled Water Coalition	(b) Clarify "ready to proceed." In order to met the eligibility requirements for work to be completed within 24 months, it would be helpful to list the specific Title XVI milestones (e.g., feasibility determination; NEPA compliance;) and request the status and/or schedules.	
	WateReuse Association	Giving 30 points to projects already authorized by Title XVI certainly gives an advantage to existing projects and will make it difficult for new projects to get funded. Perhaps the Bureau's intention is to clear out the existing backlog. If so, a sunset provision on this criterion might be appropriate so that other projects (in states other than ones with large backlogs of currently authorized projects) would be able to compete on a more equal footing.	
	Pajaro Valley Water Management Agency and City of Watsonville	Due to the oversubscription of Title XVI, it is necessary for project sponsors to identify temporary funding solutions in order to progress toward completion. Once completed, these projects are providing relief to surface and ground water sources. Therefore, only projects which have been completed and are operational should be awarded full credit.	
	Southern Nevada Water Authority	Subsection (a) would appear to have little relevance of the ability to complete the project. The proposed Title XVI project completion criteria would more accurately measure the ability of the project to reach completion if a detailed schedule was required showing all activities, costs, progress to date, all funds expended (federal and non-federal), and narratives to justify milestones. Examples of previous project schedules and expenditures should also be provided with references. Also, in subsection (b) the project completion criteria should require information on all Title XVI pre-construction requirements listed on page 3 of the Draft Funding Criteria, not just environmental compliance and other permits to form a complete picture of contractor abilities.	
	Will & Carlson, Inc.	How can the Bureau even consider awarding points in this area with the inclusion of the questions in (b)?	
	Will & Carlson, Inc.	Reclamation should already know the answers to (a).	
	Will & Carlson, Inc.	Your criteria appear to start with a premise that all of these projects are equal in their benefits. I don't believe that is true. Shouldn't the metric here be limited to the extent the project sponsor has provided all of their funding and is just waiting on the remainder of the Federal share? And if the Federal government can provide their funding in one year and be done, there are X points... and if it is two years there are fewer X points?	
	Will & Carlson, Inc.	Some consideration might be given to where these projects rank in priority according to the state and/or the state water plan. And then using that information in the context of points for completion.	
	Will & Carlson, Inc.	There is no good reason why Federal money is being provided to any project that hasn't completed the elements in (b). The exception might be with regard to some preconstruction funding assistance.	

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Section 3 Environment and Water Quality	Defenders of Wildlife	We suggest that 'Environment and Water Quality' be worth as many points as 'Water Supply.'" "Reclamation should broaden the environmental criteria so that the provision of water and habitat for threatened and endangered species suffices (as it does in subsection (c)).	See revisions to Section 3 (Environment and Water Quality) Some comments suggest reducing the number of points allocated to this section, while others suggest an increase. As part of revisions, point totals have been revised. The number of points allocated to this section has been revised from 25 (of 175 total) to 30 (of 200 total).
	Metropolitan Water District of Southern California	Consider moving water quality component of this criteria and fold into Criteria #7, Watershed Perspective.	
	San Diego County Water Authority	Reduce points from 25 to 20 to reflect that in many regions, regulatory agencies do not permit the discharge of recycled water for environmental enhancement purposes.	
	Bay Area Recycled Water Coalition	Are (b) and (c) to take into consideration project benefits to listed and non-listed species outside of the project area? For example, impacts to species that are associated with the source water supply that will be replaced by recycled water (e.g., California Delta).	
	Goleta Water District	We further suggest revising the criteria as follows:...3) Environment and Water Quality - 20 points	
	NRDC	This criterion should be merged with the criterion entitled 'Watershed Perspective,' for a total of at least 35 points, and given priority over the Title XVI Project Completion criterion. First, whether the project promotes a watershed perspective is an important aspect of the extent to which the project demonstrates an environmental benefit. Second, a project with limited environmental and water quality benefits should not be green-lit for funding simply because the project would bring an authorized Title XVI project to completion. Further, this criterion should ask how the project intends to deal with Constituents of Emerging Concern (CECs). For instance, will the project include a regularly-updated monitoring program that responds to new scientific evidence regarding CECs?	
	Pajaro Valley Water Management Agency and City of Watsonville	All Title XVI projects must undergo significant environmental impact and design reviews as well as state, local, and federal licensing requirements. These processes are designed to protect stakeholders and the quality of the project site and its surrounding environment. The core goal of Title XVI is to create alternative water supply and thus reduce demands on current sources. While this inherently protects 'non-federally listed species' including criterion to protect non-federally listed species would change the nature of the Title XVI program from water supply to environmental restoration. The criterion to protect non-federally listed species should be rewritten to only provide credit for projects that offset future water demand from the habitat of federally listed species.	
	Will & Carlson, Inc.	In reading through these criteria what seems lost in the effort was the original justification for a sponsor undertaking their project. -What were its authorized purposes and what was the justification provided in testimony and hearings before the Congress? Simply stated: the Bureau of Reclamation shouldn't be in the environmental restoration business. Leave that to the professionals and the budget in the U.S. Fish and Wildlife Service. The points should be focused on the elements that are contained in (a) and the content of the original authorization.	

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Section 4 Renewable Energy and Energy Efficiency	Eastern Municipal Water District	EMWD believes that priority should not be given to projects that include installation of hydro-electric, solar-electric, wind energy, etc....Reclamation's mission is to manage and develop water and realated resources in an economically and environmentally sounds manner; its mission does not promote specific energy producing projects. EMWD recommends that paragraph 4.(a) be eliminated from the criteria.	See revisions to Section 4 (Renewable Energy and Energy Efficiency) Criteria have been revised to make clear that project sponsors should describe methodology for energy consumption calculations. Criteria have also been revised to request a description of energy recovery processes along with any renewable energy components. Integration of energy and water policies is a key aspect of the WaterSMART Program. Funding criteria for the Title XVI Program and other related programs are intended to identify and support projects that promote sustainable water strategies, including attention to the relationship between water and energy demands. One comment asks whether credit will be given for additional of a renewable energy component that is not needed for the project phase. The intent of this criteria section is to identify project phases that address the integration of energy use and water use. No credit will be given for project features that do not contribute to energy savings or meet other goals. Another comment raises the concern that these criteria may, in effect, change the rules for existing projects. The criteria are not intended to establish new rules or requirements, but instead are intended to provide an opportunity for project sponsors to submit information so that project phases that most effectively meet the priorities expressed in the criteria may be identified for funding.
	Metropolitan Water District of Southern California	Energy efficiency criteria should consider net energy off sets as a result of the project compared to currently available supplies including imported water. Project sponsors should also describe benefits of any energy recovery devices or processess.	
	Bay Area Recycled Water Coalition	Does question (a) mean if a wind turbine is added to a project, even though it is not needed for the project, the project will get more points? Are renewable energy components of recycled water projects (i.e. solar, wind, biomass, biofuels, etc.) eligible for Title XVI funding? If not, the appropriateness of this criterion is questioned. Will Reclamation use these criteria to assign 'energy efficiency' rankings to projects, such as desalination cersus a recycled water project using only tertiary effluent? Is it appropriate for Reclamation to essentially add a renewable energy requirement to these already authorized projects? At a minimum, the point rating on this criterion should be reduced from 20 to 5, if not eliminated completely.	
	Goleta Water District	We further suggest revising the criteria as follows:...5) Renewable Energy and energy Efficiency - 15 points	
	NRDC	NRDC supports requiring a comparison of the project's energy consumption to alternative water supply options, including existing water supply options. Given the need to address climate change, energy uses associated with water projects that apply for funding must be fully and carfully evaluated. For purposes of an energy consumption comparison, however, 'alternative water supply options' should include water conservation and efficiency.	
	Association of California Water Agencies	For (b), clarify that points will be awarded if completion of the project will result in a lower embedded energy level than the agency's existing or alternative water supply options.	
	WateReuse Association	We believe it would be desirable to see the amount of renewable energy proposed for a project expressed or measured as a percentage of the project's overall energy consumption. A project might have a great renewable energy component, but if it only comprises 5% of the overall amount of energy required, it might not be very meaningful.	
	Will & Carlson, Inc.	The same issues raised in the above section hold true for this section. Though it might be useful to look at this element, it is the equivalent of changing the rules in the middle of the game. Most of these projects are older 'authorizations'. This would appear to serve up a further delay as plans and specs are changed or updated in order to chase several million dollars. I would like to believe that if it made sense, it already would have been in the plans. This narrowly written provision seems to have been written for a specific or only a few specific projects in mind, to give them a competitive advantage in your ranking system. And I would just say that (b) is so broadly written in "reduction in energy consumption" -where?- as to be rendered a useless metric.	

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Section 5 Economics	Contra Costa Water District	The Economics Criteria should be weighted among the highest of all the criteria to ensure the federal funding goes to projects of greatest need. The economics of the recycled project should be evaluated against other equivalent water supply options available to the agency. Federal funding should only be applied when the recycled project is not the lowest cost alternative to the agency. If this criteria is met then the project should be scored higher than if the criteria is not met. After that determination is made, then the amount of the federal funds made available to the project should not exceed the difference between the project cost and the lowest cost alternative available to the agency. This way federal funding is not going to projects that would be performed without the federal funds.	See revisions to Section 5 ("Economics")
	Metropolitan Water District of Southern California	Economics criteria should clarify how grant funds other than Title XVI would be factored and or adjusted in funding allocations.	This section been revised to focus on the cost per acre-foot of water made available by the project phase for which funding is being requested and a comparison between the cost per acre-foot of the project phase and other alternatives. The revised section also provides project sponsors an opportunity to describe other economic benefits that may be difficult to quantify.
	Public Utility District No. 1 of Chelan County	Cost effectiveness considerations should also include other benefits the project may provide beyond cost/acre-foot of water created. If this project provides water resources benefits (savings) and improves water quality within the watershed, then this project should be considered for more points than a simple reduction in water consumption.	Some comments pointed out the time that might be necessary to complete an economic analysis to identify information requested in the draft criteria. Revisions are intended to limit this section to information that project sponsors have already developed as part of Title XVI feasibility studies – information that project sponsors should be able to update and include in an application for FY 2011 funding prior to the application deadline.
	San Diego County Water Authority	The assessment should be limited to a cost/benefit analysis and should not be based on cost per acre-ft. the cost per acre-ft criteria would limit funding in water short areas.	
	Goleta Water District	We further suggest revising the criteria as follows:...6) Economics - 15 points	
	NRDC	We strongly believe that points should be awarded as part of this criterion based on how cost-effective a project is. Towards this end, the Draft Criteria should require applicants to disclose the total cost of the proposed project, including costs that are covered by federal dollars or other grant monies.	
	Bay Area Recycled Water Coalition	(a) This is a very broad request: How much detail are you looking for? It is suggested to narrow the focus to reflect what Reclamation actually needs for their evaluation.	
	Bay Area Recycled Water Coalition	(b) We suggest that this criterion be eliminated as it is currently too simplistic, and a true economic analysis is very time-intensive and costly. Projects authorized in Title XVI have already been signed into law and determined worthy of funding, and the project sponsor is providing 75% of the cost. This ranking / criterion does not reflect the way that a new recycled water project is designed and built. An agency's recycled water program is usually built in phases. The nature of water recycling projects is that the first phase of work is usually the most expensive on a cost/acre-foot basis. This is because it can include the large one-time capital expenses for treatment, storage and constructing the distribution system backbone. Yet, these capital investments are the reason that a project sponsor needs funding assistance. Later phases of the program that are simply pipeline extensions of the existing system generally carry a lower cost/acre-foot. Without funding assistance, the whole project may never be built. If an economics analysis is to remain a criterion, it should focus on dry year supplies and compare costs of alternative dry year water supply projects that would supply the same yield. If the alternative water supply is a new reservoir storage, then the amount of storage required to be in place for the same yield that a recycled water project can supply on demand in an extended drought needs to be used (i.e. apples to apples comparison). In addition the acre-foot cost, as proposed, is too simplistic, as economic analysis is more than "annualized life cycle cost divided by average annual acre-feet. What is factored into the annualized life cycle costs? Does it include avoided water supply costs? Avoided wastewater disposal costs? Improved wetlands and stream flows? End user's avoided cost for using recycled water versus potable water? In addition, there are many other intangible or qualitative economic benefits to recycled water projects that are not going to be realized through a simplified cost/acre-foot calculation.	

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	Southern Nevada Water Authority	The Authority suggests that an item be added to the Proposed Criteria: 5 Economics requiring the applicant to show the relationship of the project cost to other projects under consideration that will not be constructed if the proposed project is approved.	
	Will & Carlson, Inc.	The category raises an interesting consideration: Why isn't this program and these projects evaluated under the criteria in the Principles and Guidelines? Those criteria and the proposed new changes underway would seem to provide the answers that you are seeking for evaluation purposes. An alternative would be to have that information provided during the NEPA (National Environmental Policy Act) process for those projects that have not undergone either that or a similar effort at the state level. With regard to (b), why doesn't the Bureau provide the values so that apples to apples can be compared among projects, not apples to oranges? It would seem to me the Bureau should want to make a comparison of alternatives that were considered and to have some risk analysis provided along with that (given the health implications that have been raised regarding recycled/reuse water).	
Section 6 Legal and Contractual Water Supply Obligations	Association of California Water Agencies	Paragraph (b) should be removed to keep small and large projects on equal rankings.	See revisions to Section 6 of the criteria, which has been separated into two sections (Legal and Contractual Water Supply Obligations and Benefits to Rural or Economically-Disadvantaged Communities) Several comments pointed out that economically-disadvantaged communities may exist within larger urban areas. The criterion has been revised to make clear that a project phase serving economically-disadvantaged communities in either rural or urban areas will receive consideration under this section.
	Eastern Municipal Water District	EMWD is perplexed why small or rural communities would get priority over larger projects. If the goal is to increase water supply and reduce imported water demands, the size of the community should not matter. Also, since there is a 75% match required, it may not be realistic that many small or rural communities can successfully participate in this particular program. EMWD recommends that paragraph 6.(b) be eliminated and the possible points for the Legal and Contractual Water Supply Obligations be reduced to 10 points.	
	Metropolitan Water District of Southern California	A definition for rural community is included in the criteria. Similarly, a definition for economically disadvantaged community is needed. There are many examples of economically disadvantaged communities within large cities. At what level would this be addressed?	
	Orange County Water District	Many worthy projects serve an urban or regional area within which disadvantaged communities exist. The current draft criterion fails to provide a sufficient description or definition of what constitutes 'small' and 'economically disadvantaged' communities and how either of these terms may be interpreted for consideration purposes. PCWD recommends that the criterion specifically define what constitutes 'small' and 'economically disadvantaged' communities in this section. Furthermore, OCWD recommends that a water agency that has small, rural or economically disadvantaged communities within its service area receive points for these communities under this criterion.	
	San Diego County Water Authority	Reduce points from 20 to 15 to reflect that many agencies who would qualify and are actively seeking Title XVI funding cannot be defined as 'small, rural, or economically disadvantaged communities'. Additional credit should be given for areas with greater population density which may encompass disadvantaged communities.	
	Goleta Water District	We further suggest revising the criteria as follows:...7) Legal and Contractual Water Supply Obligations - 15 points	
	Bay Area Recycled Water Coalition	(b) It is not apparent how serving economically disadvantaged communities fits under the <i>Legal and Contractual Water Supply Obligations</i> heading. Maybe the heading should be revised to be more descriptive. As written, it reads that there are three types of communities that can gain points: small or rural or economically disadvantaged. Is it supposed to read 'small rural or economically disadvantaged'? If it is a separate category, then it should be defined. Rural is defined by a population number without any associated land use density criteria. Please clarify. Also, economically disadvantaged community needs to be defined for this criterion (e.g., average household income equal to XX of federal poverty limit).	

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	WateReuse Association	The focus on rural and disadvantaged communities in Paragraph (b) should be deleted. Many promising projects may serve an urban or regional area within which disadvantaged communities exist. The ability to develop such projects can deliver significant water savings. The criterion, however, suggest that this distinction is not recognized. At a minimum, the criterion should specifically reference water agencies that <u>may</u> have disadvantaged communities within their service area. Similarly, we recommend that the criterion spell out what constitutes such a community. In general, few communities with a population of less than 50,000 construct water recycling projects. Larger projects provide a better match to Federal dollars and more 'bang-for-the-buck.' While rural community needs are important, we recommend that all proposed projects be examined and ranked without regard to such a criterion.	
	Pajaro Valley Water Management Agency and City of Watsonville	In particular we are especially supportive of the criteria under the Legal and Contractual Water Supply Obligations and Watershed perspective categories.	
	Will & Carlson, Inc.	Again, I raise the same issues with this section as were raised in the Environmental and Water Quality section. River restoration and minimum flow requirements go outside of the original intent of this program and the projects that have been authorized. This is 'mission creep' by way of new justifications. While I understand the distinction between economically disadvantaged communities in this proposal to that of urban areas, I have trouble understanding your use of the word "rural". There are existing programs at the USDA and the EPA that already address that distinction. And I would add the definition of "rural" here is much larger than is commonly used for these programs. This program is what it is: an urban water program. Just stick to most of the criteria that are used in (a).	
Section 7 Watershed Perspective	Association of California Water Agencies	Recognizing importance of watershed/regional approach is commendable and should be given more points.	See revisions to Section 7 of the criteria ("Watershed Perspective")
	Metropolitan Water District of Southern California	Incorporate water quality component criteria as part of Watershed Perspective. Criteria should also address water quality improvements that are integral to plans adopted by regional water quality control boards or local basin management authorities.	The weight given to this section has been increased in response to several comments noting the importance of this criterion.
	Orange County Water District	OCWD supports the consideration and award of points upon the extent to which the project promotes a watershed/regional approach. Active collaboration within the watershed and among regional partners is an important factor in addressing the persistent water scarcity issues in the West.	In addition, this criterion has been revised to provide a general definition of "watershed perspective" in response to the comment that the terms used in this section were unclear and might lead to confusion.
	Public Utility District No. 1 of Chelan County	Recommend increasing the value to 20 points due to value these collaborative efforts provide to watersheds. Watershed perspectives are very important and projects done in relative isolation can lack support of the greater community or miss out on opportunities to capitalize on relevant efforts occurring elsewhere in the watershed. In addition, projects that solve multiple issues or problems within a watershed should be scored higher. Increasing the scoring for this criterion provides flexibility to recognize these expanded considerations.	
	San Diego County Water Authority	Increase points from 10 to 20 to reflect the importance of integrated regional planning and adoption of regional management approaches.	
	Bay Area Recycled Water Coalition	This point allocation is too low. A suggested amount of 30 versus 10 points is appropriate compared to the other ranking criteria. The logic of the increased weighting is that projects that are a part of a regional partnership (like the 14 agency Bay Area Recycled Water Coalition) come with efficiencies for Reclamation, including a reduced amount of staff time needing to be spent with individual project sponsors versus a regional group. This type of approach should be incentivized by Reclamation and should be reflected in these criteria with a higher point total.	
	WateReuse Association	The idea of promoting a watershed/regional approach to Title XVI funds is a good one. Perhaps this criterion should have a greater weighting than 10 points out of 175 (5.7%).	

Criteria Section (March 2010 Draft)	Comment submitted by	Full Text of Comment	Reclamation's Response
	Pajaro Valley Water Management Agency and City of Watsonville	In particular we are especially supportive of the criteria under the Legal and Contractual Water Supply Obligations and Watershed perspective categories.	
	Will & Carlson, Inc.	Though believing in the concept, I am again troubled by the lack of definition of terms. What do you mean by "entities"? What do you mean by an "integrated resource management approach"? And these projects should have already been in those "regional or state plans"; it is that planning perspective that should be rewarded. It shouldn't be in "other Federal watershed plans". The Bureau of Reclamation needs to provide much better definition to these terms and other key concepts throughout this document to limit future points of confusion and possible litigation over the work that a project sponsor has undertaken with regard to their proposal, as a result of applying the Bureau's criteria.	