



Coordinating Committee
San Francisco Bay Area
Integrated Regional Water Management Plan
c/o San Francisco Public Utilities Commission
525 Golden Gate Avenue
San Francisco, CA 94102

April 7, 2016

Craig Cross
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236

Dear Mr. Cross,

The SF Bay Area IRWM Coordinating Committee is grateful for this opportunity to provide recommendations and comments on the Draft 2016 Proposition 1 IRWM Guidelines, Draft Disadvantaged Community Involvement Program Request for Proposals and Draft Proposition 1 Planning Grant Proposal Solicitation Package.

We wish to thank the staff of the California Department of Water Resources (DWR) for continuously improving the IRWM program and efforts to involve all stakeholders in the IRWM Program under Proposition 1.

Draft 2016 Proposition 1 IRWM Grant Program Guidelines

Grant Revision

In **Section II. INTRODUCTION AND OVERVIEW** the guidelines limit the reasons for making changes to the Guideline to those necessary due to “legislation” and “changes in State’s water management policy.” We request that this sentence also include changes that may be necessary “to clarify the intent of Proposition 1.”

Disadvantaged communities (DAC), economically distressed areas (EDA), and underrepresented communities.

The Draft 2016 Proposition 1 IRWM Grant Program Guidelines (Guidelines) are structured well to incorporate the new program requirements and Plan Standards and to allow for regional variances to identify and include economically disadvantaged communities, under-represented communities and California Indian Tribes.

In keeping with the intent of Proposition 1 we ask that the Guidelines clearly state that “disadvantaged communities (DAC), economically distressed areas (EDA), and underrepresented

communities (URC) are collectively referred to as DACs within this document and for the purposes of the IRWM Program.” We encourage that this be clearly spelled out within each of the three documents when the term DAC is first introduced and then subsequently when ever the acronym or a definition is provided. In the Proposition 1 IRWM Grant Program Guidelines the first opportunity is in **Section II. INTRODUCTION AND OVERVIEW, Section B. Funding Opportunities**, under the bulleted sections for “Disadvantaged Community Involvement Program and “Implementation Grant Program.” We recommend that the same relationship be included within **Appendix B – Definitions, Appendix E – Disadvantaged Communities, and Appendix F - Economically Distressed Area.**

Local cost share requirements and leveraging funds

Section II, C. Minimum Local Cost Share Requirements of the guidelines states that “other State Funds, if part of the funding package for the proposal, must be included in the total proposal cost but cannot be used as local cost share.” We recommend that the guideline requirement for the 50% cost share be based on the calculation of the total proposal cost less other state funds to be applied to the project. Also, to be consistent with Proposition 84 2015 Implementation round of funding and to assist in leveraging funds and to support **Section 11, Section D. Program Preferences and Statewide Priorities**, we recommend that any state funding program where the funds originate as federal funds be considered as eligible as a match for Proposition 1 grant programs.

We also submit that the current options provided by DWR to documenting cost share are challenging. A third alternative would be helpful to project proponents and regions. The ‘concurrent drawdown’ method requires that a project task is invoiced with reimbursement and cost-share expenses as a fixed percentage for the life of the grant. If cost share comes from other grant funds and/or local match that cover very specific tasks of a project, a percentage of expenses and cost share by task is difficult to apply to each invoice. The ‘by task’ method is challenging as some forms of cost share cannot be spent up front. To obtain grants to assist in cost share they are often awarded after the IRWM grant award. We recommend that the invoicing process be able to accommodate new sources of cost share over the life of a multi-year project and that an alternative method of documenting the cost share, such as a proportionate amount of cost share, be invoiced based on the amount of grant funds expended overall and not by task.

Support Regional autonomy in Program Preferences

Section II, Section D. Program Preference and Statewide Priorities interprets Program Preference to “Implement IRWM Plans with Greater Watershed Coverage” as giving priority “to projects in IRWM Plans that cover the greater portion of the watershed.” In the Bay Area there are number of communities experiencing conditions negatively impacting human health and natural resources. Though implementing large multi-benefit projects may meet integrated objectives there are times when critical more localized projects need to be addressed to help the most disadvantaged communities. We recommend that DWR respect for each region’s diversity of approaches towards prioritization of implementation projects by allowing the benefit of a project to be determined by the regions.

Also in this section under “Employ New and Innovative Technology or Practices” we ask that the following be added to the end of this paragraph listing some, but not all, of these practices, “and the application of Traditional Ecological Knowledge in coordination with regional Tribe(s).” This will

encourage all RWMGs to integrate TEK and work with the appropriate regional Tribe(s) to do so in keeping with CA Water Plan Update work of DWR.

In the **Chart on Table 1 – Statewide Priorities** we recommend that in **Action 5. Manage and Prepare for Dry Periods** there be emphasis added to support regional sustainability and autonomy to lessen reliance on conveyance from other watersheds and regions wherever possible.

Flexibility of Timing of the 50% Advance Payment

Section V. Proposal Selection, Section F. Eligible Costs and Payment, Reimbursement & Advance Payment authorizes 50% advance payment to IRWM projects to non-profit organizations and/or proponents of projects that benefit DACs, EDAs and URCs under SB 208 and Water Code 10551. Currently the Guidelines state that the advanced funds will be made available for qualified projects within 150 days of grant execution and that the funds “will be expended within six months of receipt. The beginning of project implementation has sometimes involved long periods of preparation including procuring permits and CEQA documentation. We therefore recommend that DWR allow for some flexibility about the timing of when these advanced payments must be expended for those who are making adequate progress and submitting documentation of how the funds are being expended. Additionally, the project sponsor can determine when to accept the advance of funds to help to ensure the timing of finances so that funds are available when most needed.

We further recommend that in Appendix G – Advance Payment the list of Eligible Local Project Sponsors includes “Eligible California Native American Tribes or Tribal Communities” under the sub-bullet of Disadvantaged Communities.

Appendix A – Useful Web Links

Please provide information regarding the SGMA Program and other programs referenced in the guidelines but that are not listed in the Appendices.

Draft Disadvantaged Community Involvement Program Request for Proposals

We are encouraged that Proposition 1 and the resulting IRWM and the Disadvantaged Community Involvement Program is accepting of a diverse set of definitions and the use of new tools like the “Economically Distressed Area” (EDA) and local census and surveys to provide support to those communities with economic hardship that were excluded by the previous “Disadvantaged Communities” criteria.

Data from the US Census Bureau and/or the CA Employment Development Department (EDD) labor statistics are problematic sources because many families are not documented by these systems. For example, in the Bay Area there are families that have been unemployed so long that they are no longer eligible for EDD services. Also, each census year a large number of families do not complete census forms due to lack of documentation, their homeless status, or mistrust of the census process. The result is that the numbers collected and used to establish criteria are unreliable.

We are encouraged that a proponent can provide alternative “Financial Hardship” criterion per Step 3, Option 1. To support gathering this information we recommend that the guidelines include a list of potential resources including comparative data from the California Department of Social Services, US federal assistance programs and others that are not dependent on EDD and census data that would

reach a wider set of low income families. These resources include but are not limited to the following:

- Temporary Assistance for Needy Families (TANF)
- California Work Opportunity and Responsibility to Kids (CalWorks)
- California Medical Assistance Program (Medi-Cal or MediCal)
- Healthy Families Program in California (CHIP)
- Supplemental Nutrition Assistance Program (SNAP) or CalFresh *Program*

We are encouraged that Proposition 1 includes up-front allocations of funds for outreach, technical assistance and capacity building to economically disadvantaged communities. We recommend that these funds be distributed to allow for the greatest regional control and least amount of upfront set up time. Additionally, we recommend that the performance period for these funds be three years to allow for a region-wide needs assessment, for capacity-building and technical assistance and to allow the time needed so that DACs, EDs and URCs can actively participate prior to the final round of Proposition 1 Implementation funding.

Conclusion

We thank you for the opportunity to provide these recommendations.

If you have any questions or would like more information, please contact me or Sherri Norris, the vice chair of our Stakeholder Engagement Committee, 510-334-4408, sherri@cieaweb.org.

Sincerely,



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