



Greater Los Angeles County

Integrated Regional Water Management

Leadership Committee

900 South Fremont, Alhambra, CA 91803

April 14, 2016

Ms. Melissa Sparks
California Department of Water Resources
Division of Integrated Regional Water Management
Post Office Box 942836, Room 1115-1
Sacramento, CA 94236

Dear Ms. Sparks:

COMMENTS ON PROPOSITION 1 INTEGRATED REGIONAL WATER MANAGEMENT PROGRAM

The Greater Los Angeles County Integrated Regional Water Management (IRWM) Region thanks you for the opportunity to participate and provide comments on the development of the Proposition 1 IRWM Programs administered by the California Department of Water Resources (DWR). We offer the following comments and suggestions for your consideration:

- **Eliminate Eligibility Requirement that Projects “Must Provide Multiple Benefits” (Page 13 of the Guidelines)** – While we very much support the development of multiple benefit projects, there are cases where a single benefit project is the superior solution. This thought appears to be supported by language within Proposition 1:
 - 1) Chapter 7, Section 79742 (f) states “Projects that achieve multiple benefits shall receive special consideration.”
 - 2) Chapter 7, Section 79743 (f) (2) states eligible stormwater resource management projects “may include, but are not limited to... projects that provide multiple benefits.”

Neither of these instances appears to establish multiple benefits as a pass/fail eligibility requirement nor do they appear to direct penalties for single benefit projects.

- **Modify the 2016 IRWM Grant Program Guidelines to Clarify that State Revolving Fund (SRF) Loans May Count as Part of Local Matching Funds** - Currently, page 8 of the Draft 2016 IRWM Grant Program Guidelines states that “Local cost share may include, but is not limited to, federal funds, local funding, or donated services from non-State sources. 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.” As acknowledged by both DWR and the State Water Resources Control Board, SRF loans must be repaid with local funds. Therefore, it seems reasonable to consider SRF funding as eligible to be part of the “local share” when calculating the match provided by the project proponent, which will allow more projects to be eligible, particularly given the 50 percent matching requirements for Proposition 1.

In 2015, the Legislature decided that SRF funding should be allowed to be considered local match in the context of the State Water Resources Control Board’s Recycled Water program (see page 7 of the Proposition 1 Water Recycling Funding Program Guidelines, which state that “Local cost share may be provided by CWSRF financing.”). We do not believe there is any limitation on the use of SRF loans as match for the IRWM Program in Proposition 1.

- **Establish Two Rounds of Solicitations for Implementation Funds** - Two rounds of funding will increase the number of projects, particularly Disadvantaged Community (DAC) projects, eligible to compete for IRWM Program funding.
- **Execute agreements with individual IRWMs rather than one representative from each Funding Area for the Disadvantaged Community Involvement program; determine funding allocation methodology for each IRWM** – DWR’s requirement of one proposal per Funding Area for the Disadvantaged Community Involvement program will necessitate extensive logistical and political coordination and should be revised instead to require agreements with individual IRWMs. The timeline for this coordination would be lengthy and make meeting the current deadlines difficult. Further, to simplify and expedite the proposal development and approval process, DWR should develop a methodology to assign funding to individual IRWMs.

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The County of Los Angeles has engaged in integrated, collaborative planning and development of multibenefit projects for almost two decades. Through the County's leadership, this approach to water resources management has grown and expanded, and is now reflected in how regulators approach implementation of the Clean Water Act. The Los Angeles County area has reached a state where we now have comprehensive lists of multibenefit projects to address water resources challenges. The next challenge is how to finance them. Once again, the County of Los Angeles has taken a leadership role and announced they will be looking to create a new regional funding source to address drought resilience and other water resources challenges. We recommend the Proposition 1 Guidelines be revised to recognize regions that have made efforts like these by giving them preference in the distribution of grant funds.

We thank you again for the opportunity to comment. If you have any questions, please feel free to contact Mr. Russ Bryden, GLAC IRWM Region at (626) 458-4334 or rbryden@dpw.lacounty.gov.

Very truly yours,

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

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