



## Regional Leadership

April 8, 2016

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

*Electronic Transmittal: [DWR\\_IRWM@water.ca.gov](mailto:DWR_IRWM@water.ca.gov) and  
hardcopy mailed via US Postal Service*

Regarding: Comments on the Draft 2016 IRWM Guidelines, Draft Planning Proposal Solicitation Package, and Draft Disadvantaged Community Involvement

Dear Craig Cross and Melissa Sparks,

Mountain Counties Water Resources Association (MCWRA) and Sierra Business Council (SBC) submit the following comments on the draft RFP:

- Section II. FUNDING
  - We have concerns about the disproportionately small share of DAC engagement funding being allocated to the Mountain Counties (MCO) funding area. This funding area is of great statewide significance as part of the headwaters of the state's water system and a source of freshwater inflow to the Delta. It is an extensive area, thus travel alone will be a big cost; and the MCO area has the highest number of individual IRWM regions with whom the grantee will need to coordinate and collaborate on outreach and engagement efforts, yet this area receives the smallest allocation among the 12 areas – roughly half the amount of the next smallest area allocations: Colorado River and Lahontan. Just as an example, a previous DAC pilot project in a single basin – Kings – received \$500,000, and it only involved portions of two counties.
- Section IV – ELIGIBLE COSTS; last sentence
  - Grantees are encouraged to limit direct administrative costs to no more than 5 percent of the total grant share amount.

In view of the extensive DWR IRWM financial and reporting requirements, the length of the proposed DWR contract timeline of two years, and the disproportionate funding share for the Mountain Counties Funding Area compared to the other regions, e.g. (Los

Angeles \$9.8 million - Mountain Counties - \$1.3 million) we request that DWR raise the administrative cost allowance from 5 percent to 10 percent for this funding area, (e.g. 5% - \$65,000 to 10% - \$130,000)

We also recommend clarifying what constitutes administrative costs by changing the wording on line three of this section "direct administrative costs" to "administration and financial service costs". This will distinguish between costs associated with actual program development and implementation and those related to grant management and reporting.

- Question: does DWR's 50% advance payment option apply to work being under this DAC Involvement RFP?
- Question: If funds from the Disadvantaged Community Involvement grant program are not used, will DWR reallocate the remaining funds to the DAC Implementation Grant Program?
- Question: Will DWR allow any flexibility on the two-year timeframe for expenditure of funds under this program?

Thank you for this opportunity. If you have any questions, please contact us directly.

Sincerely,



John Kingsbury  
Executive Director  
Mountain Counties Water Resources Association



Steve Frisch  
President  
Sierra Business Council