



NEVADA IRRIGATION DISTRICT

1036 W. Main Street, Grass Valley, CA 95945-5424
(530) 273-6185 ~ Fax: (530) 477-2646 ~ www.nidwater.com

April 8, 2016

Via U.S. Mail & e-mail: dwr_irwm@water.ca.gov

California Natural Resources Agency
Department of Water Resources
Division of Integrated Regional Water Management
P.O. Box 942836
Sacramento, CA 94236

Attn: Craig Cross, Melissa Sparks

RE: Comments on the DRAFT 2016 Request for Proposals Disadvantaged Community Involvement

Dear Mr. Cross and Ms. Sparks,

The Nevada Irrigation District (NID) appreciates the opportunity to review and comment on the California Department of Water Resources' (DWR) Integrated Regional Water Management DRAFT 2016 Request for Proposals for Disadvantaged Community Involvement. NID is one of the founding members of the Cosumnes, American, Bear, Yuba (CABY) IRWM. We have successfully worked with our partners to develop, adopt, implement and revise the CABY IRWM Plan, and to also facilitate significant grant funding to implement priority projects contained within this plan.

The following comments address our concern regarding the use of the Mountain Counties Overlay Area as you group many IRWMs that form a very large and diverse geographic region. We are familiar with the Department of Water Resources' rationale and intention behind this overlay area, and the similarities that exist when broad strokes are applied to these rural regions on the western slopes of the Sierra Nevada. However, the following significant and important distinctions are found when you compare the Northern area with the Southern area within this region which warrant your reconsideration of using this overlay tool as we undertake the Disadvantaged Community (DAC) Involvement process. NID asks that you consider our comments in your allocation of funding to overlay areas and in the selection and administration of funding awards.

1. **The Mountain Counties Overlay Area should be divided into two smaller regions based on population and climatic differences with a common border at the southern extent of the CABY IRWM.**
 - a. Group the Mountain Counties Overlay Area IRWMs into **two smaller clusters**: 1. From southern CABY border through the northern reaches of the Upper Feather River Watershed (which includes from south to north: CABY, American Rivers Basin, Yuba County, North Sacramento Valley, Upper Feather River Watershed); and 2. The remaining IRWMs (which includes: the MAC, Tuolumne-Stanislaus, Yosemite-Mariposa, Madera, Southern Sierra). With this division, you will have two clustered IRWM regions that follow population density trends with the **North** having a higher density (629,724 Total Population within the DAC places, DAC tracts, and DAC block groupings using current DWR mapping data). In the **South**, the Total DAC population (253,185) is significantly less than the current data for the northern region of the Overlay Area. Water needs of the northern region are familiar and part of the ongoing CABY program; and, these needs are similar to the water needs of American Rivers Basin, Yuba County, North Sacramento Valley, and Upper Feather River Watershed.
 - b. The Northern region IRWMs within the Mountain Counties Overlay Area have a precipitation pattern and water management strategy based on historical **hydrologic patterns**, and we are working both individually and collectively to develop solutions to the effects of climate change in our region. The Southern part of this region has a more advanced situation with unique issues associated with climate change that suggest a redirection of priorities from floodwater storage to catastrophic fire risk reduction.
 - c. The CABY IRWM covers the majority of the Northern Region and we currently have active and productive working relationships with a broad group of stakeholders including county agencies, tribes, and other critical inroads to accessing and working with Disadvantaged Communities and individuals. This relationship will provide a foundation in our successful effort to achieve the goals for DAC Community Involvement as stated in the DRAFT 2016 RFP. This foundation can be reasonably applied to the rest of the Northern IRWMs, however our similarities and familiarities are diluted when applied to the entire Mountain Counties Area.

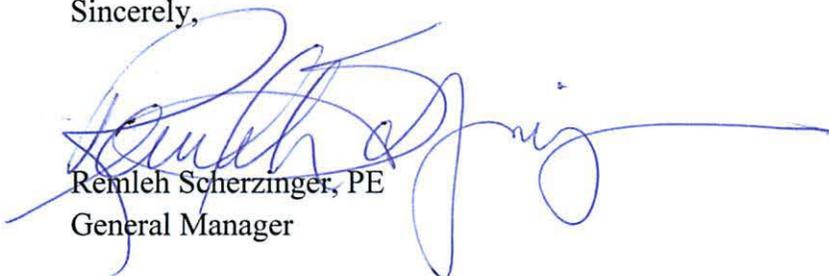
Mr. Cross and Ms. Sparks
April 8, 2016
Page 3

2. Timing of IRWM Update to Meet Prop 1 Guidelines and Completion of the Disadvantaged Community Involvement Process needs to be clarified.

As we review the DRAFT 2016 IRWM Grant Program Guidelines and the 2016 RFP for Disadvantaged Community Involvement Guidelines, the actual DAC involvement and participation in the CABY IRWM Plan update appears to be a step that occurs after the initial DAC Outreach and Involvement has been forged. At this time, CABY has worked with success to achieve initial DAC involvement, however additional effort is warranted. The timing of both issues needs to be addressed; undertaking both activities concurrently will likely result in inconsistencies between the CABY IRWM Update Process and the area wide DAC Involvement process.

We hope you will consider and incorporate this input into the FINAL RFP for Disadvantaged Community Involvement.

Sincerely,



Remleh Scherzinger, PE
General Manager