



Santa Ana Watershed Project Authority

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One Water One Watershed

AWRA INTEGRATED WATER RESOURCES MANAGEMENT AWARD
HARVARD KENNEDY SCHOOL'S TOP 25 INNOVATIONS IN AMERICAN GOVERNMENT



April 7, 2016

Thomas P. Evans
Commission
Chair

VIA EMAIL
DWR_IRWM@water.ca.gov

Mr. Keith Wallace
Program Manager
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236

Celeste Cantú
General
Manager

Re: Comments to the Proposition 1 2016 IRWM Draft Documents Released January, 2016

Orange
County
Water
District

Dear Mr. Wallace,

Thank you for the opportunity to provide comments to the Proposition 1 2016 IRWM draft documents released in January, 2016. This letter organizes our comments into two sections, one for the Planning Grant Proposal Solicitation Package (PSP) and Grant Program Guidelines, and the other for the Disadvantaged Community Involvement (DACI) Request for Proposals document.

Western
Municipal
Water District

Planning Grant PSP and Grant Program Guidelines:

The Regional Acceptance Process (RAP) is described on page 4 of the PSP with a process for new regions to submit a planning grant application and RAP materials simultaneously. We want to ensure that the watershed approach, as described in Water Code Section 79742(a), is implemented by DWR in the RAP process going forward. This aligns with the intent of Proposition 1, Proposition 84 and many IRWM documents that DWR has produced that express the importance of a watershed approach acknowledging how improvements or challenges anywhere in a watershed impact that entire watershed. Support Actions in the 2015 Draft Strategies for the Future of IRWM in California document prepared by the DWR, "promote inter-regional cooperation and collaboration and work with regional water management groups to identify and resolve barriers to inter-regional water management planning and implementation."

Eastern
Municipal
Water
District

San
Bernardino
Valley
Municipal
Water
District

To ensure the intent of the Water Code Section 79742(a) is implemented, we suggest adding to the paragraph that discusses the RAP in the Planning Grant PSP Section II. Eligibility A. Eligible Applicant. Suggested text could include:

Inland
Empire
Utilities
Agency



RAP consideration should reflect Program Preferences under Water Code 79742 and new potential regions will not be given consideration when the proposed region is located within a larger watershed that has already been approved through a RAP.

The benefits of integrated water management include better coordination across functions that are often managed separately, and across geographic scales that match the scale of the hydrologic system and the challenges it faces. Through integration at the watershed scale, hydrologic and environmental performance is more effectively balanced.

It is also our preference that a single implementation funding round be scheduled in 2018 to take greatest advantage of the IRWM planning and DACI program grants, as well as the State Board Technical Assistance program, the Stormwater Resource Management Planning, and the Sustainable Groundwater Management planning that is underway. In addition, existing IRWM Plans require updates to reflect legislative changes.

Our request for a single implementation funding round as opposed to multiple rounds reflects our preference to minimize the administrative costs incurred during grant application preparation.

Disadvantaged Community Involvement Request for Proposals

We wish to express our support for the effort DWR has undertaken to produce the Disadvantaged Community Involvement Program request for proposals. We agree that the scope of permitted activities and desired objectives are critically needed for the members of disadvantaged communities throughout California, and that Integrated Water Management will only be strengthened by their involvement.

In response to the public comment period, we have four items to for you to consider:

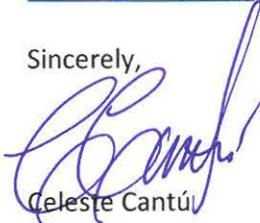
1. We appreciate that this grant is being awarded in a single funding round to accomplish a comprehensive scope of work to achieve outcomes as described in the guidelines. For our region, a multi-round funding process for this program would extend the timeline in a non-productive way, and necessitate unneeded additional local grant-seeking effort.
2. We appreciate the flexibility afforded the regions to define what “underrepresented communities” means in the context of this work. Allowing the regions this supervised discretion fulfills the IRWM goal of local decision-making, and will permit more flexible approaches to particular local contexts. We fully support current DWR’s approach in not seeking to define “underrepresented communities”.
3. Among the resources allocated by Prop 1, several agencies are charged with providing benefits to members of disadvantaged communities. We applaud DWR for its strategic effort to strengthen state agency alignment to efficiently achieve multiple objectives, as described

in the Water Plan Update 2013. Lacking from this PSP is reference to the Technical Assistance (TA) Program funding available from State Board¹. State Board has published a timeline suggesting that requests for TA must be submitted by June, 2016. We request that DWR include reference to the State Board program in the PSP as an opportunity and target for additional assistance for the regions in planning projects that benefit members of disadvantaged communities. Further, we request that DWR advocate strongly for State Board to revise their timeline to assure TA resources remain available following the required Needs Assessment task in the DACI Program, as that effort will surely reveal communities that would benefit from the TA Program.

4. Given that effective community engagement activity can be a lengthy process, we request that the funding period be extended from the proposed two years to three years. The opportunity for this program to bring long-term benefits to the region will be best served by the longer term.

We hope that you find these comments helpful. If you have any questions regarding these comments, please let myself or Mark Norton on my staff know. I can be contacted at ccantu@sawpa.org and Mark Norton can be contacted at mnorton@sawpa.org.

Sincerely,



Celeste Cantú
General Manager

cc: Tracie Billington, Melissa Sparks, Zaffar Eusuff, Craig Cross

¹ http://www.waterboards.ca.gov/water_issues/programs/grants_loans/proposition1/tech_asst_funding.shtml