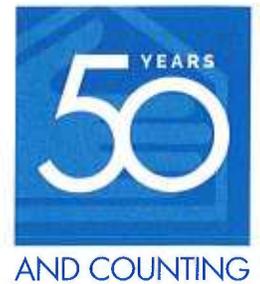




*A Nonprofit Housing and
Community Development Organization*



April 7, 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

Via email to DWR_IRWM@water.ca.gov

RE: Prop 1 IRWM Draft Guidelines

To Whom It May Concern:

We are pleased to submit our comments regarding the Prop 1 IRWM guidelines for Planning, Disadvantaged Community Involvement, and Volume 1 of the Grant Program released by your office. We have reviewed the draft guidelines, and we respectfully submit the following comments.

Self-Help Enterprises (SHE) is a non-profit affordable housing and community development organization that works to build and sustain healthy homes and communities. Part of SHE's mission involves the improvement of drinking water and sewer infrastructure in impoverished rural communities around the Valley. This endeavor centers around working with community members and local utility boards to identify needs, develop improvement projects, and assist in accessing state, local, and federal funding to bring the projects to fruition. SHE acts as a liaison between local communities and a variety of government agencies.

SHE staff participate in several IRWM groups in a variety of capacities, including sitting on some advisory committees and governing boards. We have been involved in the preparation of funding applications through numerous rounds of IRWM planning and implementation funding under Propositions 50 and 84.

IRWM Planning Grant Program

- We support the different funding caps for the various types of planning projects. At this point, most IRWM regions have written their plans. A few (4-5) areas need to develop new plans, but all others will need to make some revisions given the new legislative requirements, e.g. AB 1249 and SB 985. \$250,000 is an appropriate grant cap for plan updates.
- What is the timing of the release of these funds? We suggest that some of the planning money be saved for areas that are currently in "white areas" but have not yet decided to pursue the development of an IRWM Plan.

DAC Involvement Funds

Needs Assessment

- The required Needs Assessment should require identification of communities/districts others currently not covered by an IRWM group (white areas). The assessment should also identify opportunities available to incorporate these areas into existing IRWMs.
- Drought vulnerability assessments should be encouraged, particularly in drought impacted basins and areas with groundwater basins in critical overdraft conditions.

Governance Assessment

- A governance assessment should be a required element of these proposals, much like the needs assessment. The outcome should not be prescriptive, but DWR should set the bar high. For example, the following alternate wording could be added to the Desired Outcome: *DWR's preferred option is that this activity results in restructuring of governance structures, but will accept less as long as there were good faith efforts.* Examples of good faith efforts should be provided. Otherwise, project proponents will choose not to touch this task.

Advancement of Funds

- Do the provisions of SB 208 apply to these funds? Some areas may need the advanced funds in order to get started.

Evaluation of Proposals

- It is unclear what criteria will be considered in evaluating proposals, other than responsiveness to the RFP. While we appreciate the broad nature of the RFP, we feel it would assist regions in preparing high-quality proposals if the criteria were spelled out in some detail.

Self-Help Enterprises applauds DWR for taking such steps to involve DACs and other underrepresented communities in IRWM.

Please don't hesitate to contact me if you have additional questions.

Sincerely,



Jessi Snyder

Community Development Specialist