



SIERRA NEVADA ALLIANCE

Keeping light in the range.

Ms. Tracie L. Billington, P.E.
Department of Water Resources
Division of Planning & Local Assistance
P.O. Box 942836
Sacramento CA 94236-0001

Ms. Shahla Farahnak
State Water Resources Control Board
Division of Financial Planning
1001 I St., 16th Floor
Sacramento, CA 95814

February 7, 2007

**Re: Integrated Regional Water Management Plan Program:
Proposition 50 Implementation Grant Funding Recommendations**

Dear Tracie Billington and Mrs. Shahla Farahnak

Since 1993 the Sierra Nevada Alliance has been protecting and restoring Sierra lands, water, wildlife and communities. Our mission is to protect and restore the natural resources of the Sierra Nevada for future generations while promoting sustainable communities. The organization is an Alliance of conservation groups that are based or work in the Sierra Nevada region. There are over sixty member groups that span the entire 400-mile mountain range.

The Sierra Nevada Alliance believes that integrating water planning on a regional level is critical to protecting and restoring Sierra waters while providing healthy and ample water to the states of California and Nevada. In addition, the Alliance believes integrated planning is needed to address the impacts of climate change to the region in ways that protect water quality, habitat and water supply.

The Sierra Nevada Alliance has been participating in the Cosumnes American Bear Yuba Integrated Regional Water Management Planning (CABY IRWMP) process since its launch in 2005. The Alliance is also tracking other IRWMPs in the Sierra and the rest of the state. Our goal is to determine what are the best processes and plans and export this information to assist strong integrated plans being adopted and implemented throughout the entire Sierra region.

From our experience, we have a number of concerns and recommendations about the IRWMP process that we hope can be addressed on the local, regional, state agency and legislative level. We appreciate your consideration and response to our concerns and recommendations for the IRWMP process.

Our recommendations are as follows:

1) Fund Plumas and Tahoe/Truckee IRWMPs

We support funding for the Plumas and Tahoe/Truckee IRWMPs. As we have stated in prior recommendations regarding the IRWMP guidelines, the Sierra Nevada Alliance thinks the guidelines placed inappropriate weight on the criteria of Statewide Priorities and Readiness to Proceed. The inappropriate weight placed on these two criteria biased the Implementation evaluation against rural upper watershed IRWMPs, such as the Plumas and Tahoe. In addition, the evaluation should include criteria that require collaborative governance, stakeholder involvement and disadvantaged communities participation. With scoring for these important criteria, the Plumas and Truckee IRWMPs are much more competitive.

The Plumas and Tahoe/Truckee IRWMPs address major watershed issues through collaborative stakeholder involvement and should have received a higher score in the evaluation.

Therefore, the Sierra Nevada Alliance supports funding for both the Plumas and Tahoe / Truckee IRWMPs.

2) Don't Fund Remaining Proposed Implementation Proposals

After funding Plumas and Tahoe/Truckee IRWMPs, DWR should not fund the remaining second-tier implementation proposals because they lack significantly broad stakeholder governance, participation and benefits to disadvantaged communities, and environmental benefits.

For example, the Northern California JEP spans a huge area of the Sacramento River yet lacks genuine broad stakeholder involvement from non-profits, disadvantaged communities, resources agencies, and counties. Funding this IRWMP sends the wrong message that IRWMPs don't have to be collaborative and don't have to have stakeholder involvement nor integrated objectives with associated projects that address water quality, or environmental habitat.

The Northern California JEP scored lower than the Madera IRWMP in the first round of Implementation proposals. Yet, the Northern California JEP miraculously beat out Madera IRWMP to go on to the second round of Implementation proposals. This sends a negative message about DWR's integrity, ethics, and ability to stick to a fair competitive process.

Therefore, the Northern California JEP should not receive funding because it indicates that single goal plans created by a narrow interest are encouraged and accepted.

After funding Plumas and Tahoe IRWMPs, DWR should not fund the second-tier Implementation proposals recommended for funding.

3. If DWR Does Fund The Proposed Second-Tier Implementation Proposals, The Recipients Should Be Required To Include Broad Stakeholder In Their Governance and Revise Their Suite of Projects.

If DWR decides to fund the proposed second-tier Implementation applicants, recipients should be required to make relevant changes to their IRWMP in order to come up to a required standard in order to receive the proposed funding. This presents an opportunity for DWR to ensure broad stakeholder governance and integrated goals and objectives that address water quality and environmental habitat as well as water supply.

If implementation funds are to be disbursed to second-tier IRWMPs, DWR should require the recipients to 1) augment their governance to represent broader stakeholdership including conservation groups, counties, agricultural interests, as well as disadvantaged communities and environmental justice representatives; 2) open their suite of projects to new projects and 3) reprioritize the project portfolio with the expanded stakeholder body.

4. SWRCB Should Not Dedicate \$30 Million Solely to Coast

It is not appropriate that the SWRCB's portion of funding be dedicated to the coastal region. All funding for Prop 50 IRWMPs should be available for competition across the entire state.

SWRCB should not dedicate \$30 Million Solely to the Coast. Any remaining funds in the IRWMP program should be available for competition on a statewide basis.

Thank you for taking into account these concerns and recommendations. We look forward to working with you in the future.

Sincerely,

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