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Sent: Thursday, September 30, 2004 11:00 AM

To: Billington, Tracie

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Subject: Comments on Integrated Regional Water Management (IRWM) Grant Guidelines
September 30, 2004

Tracie Billington
Division of Planning and Local Assistance
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P.O. Box 942836
Sacramento, CA 94236-0001

Re: Ventura Countywide IRWM Plan (VCIRWMP) Coalition Comments on Draft IRWM Grant Guidelines

Dear Ms. Billington,

On August 31, 2004, Ventura County staff attended the Department of Water Resources (DWR) and State Water Resources Control Board (SWRCB) IRWM Guidelines Workshop in Ontario. In response to your request for input on the draft IRWM Guidelines, the Ventura Countywide IRWMP Coalition is submitting the following comments for your consideration.

Issue #1: Draft IRWM Grant Schedule. The Guidelines note that IRWM Planning Grant applications are due February 2005 and IRWM Implementation Grant (Step 1) applications are due March 2005. The Guidelines further note that IRWM Planning Grants will not be awarded until July 2005.

Ventura Countywide IRWMP Coalition Response: *We recommend that the State award IRWM Planning grants in April/May 2005 and defer the deadline for IRWM Implementation Grants (Step 1) to September/October 2005. The present schedule does not provide funding assistance to local groups until four months after the deadline for submitting Implementation Grants. This seems counter-intuitive because Implementation Projects will be based on the regional evaluation standards and criteria in an IRWM plan. The draft Guidelines also mention the July 2005 Planning Grants will not be retroactively applied to prior staff work. Budget cuts have adversely affected many California regional water agencies and groups, which will make it more difficult to obtain sufficient funding to prepare an IRWM Plan or IRWM Implementation. We recommend that Planning Grants should be awarded well in advance of the deadline for the Implementation Grants.*

Issue #2: Is the State's Current Definition of "Region" Appropriate? The draft Guidelines and August 31st comments from DWR and SWRCB staff indicate that the State does not intend to adjudicate between competing water evaluation criteria and competing projects of local water agencies and districts. Rather, the State has mandated that local regions must first establish appropriate evaluation criteria and project prioritization before submitting individual projects to the State for funding. This implies that each regional water group (or agencies) must undertake a significant regional collaboration effort in order to arrive at a comprehensive set of evaluation criteria and the regional prioritization of projects. Yet the Guidelines indicate that a Regional Group may consist of only three agencies, two of which have statutory authority over water.

Ventura Countywide IRWMP Coalition Response: *The current definition of "region" seems to invite a piecemeal approach to regional water planning efforts. If the State does not want to arbitrate between competing plans and projects, then it would seem appropriate to change the definition of "planning region" to consist of a county or a multi-watershed area that has regional linkages. For example, the current State definition would allow water related jurisdictions within each county to submit several "regional" plans - e.g., several watershed-specific regional plans and perhaps a countywide plan that is produced by a coalition of agencies.*

In order to meet the requirements of the present Guidelines, should each county:

1) *Develop a coordinated countywide IRWM Plan that includes separate chapters each relating to a major watershed, plus an additional "countywide" chapter that merges project evaluation standards and criteria and project prioritization for the watershed subregions?*

or

2) *Develop separate IRWM Plans (each based on a watershed) that establish watershed-specific evaluation standards and criteria and project prioritization. Under this scenario, countywide evaluation criteria and projects, for such issues as steelhead recovery efforts (that transcend watershed boundaries), would not be addressed on a comprehensive, multi-watershed*

basis?

Issue #3: Grant Agreements Executed by one Grant Recipient for each Region. The draft Guidelines indicate that only one recipient for each region will be responsible for payments, reporting and accounting per grant agreement.

Ventura Countywide IRWMP Coalition Response: *Although this requirement will simplify administrative procedures for the State, establishing a single "clearinghouse" agency that serves as the administrator for each region will impose a cumbersome bureaucracy, add financial costs to the participating jurisdictions and raises legal issues. We recommend this eligibility requirement be modified so that each agency or jurisdiction that is part of a water planning group or region should be responsible for their own accounting, payments and reporting.*

We appreciate the opportunity to provide input on the IRWM Grant Draft Guidelines. Please contact Sue Hughes or Gene Kjellberg if you have questions regarding these comments.

Sincerely,

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