



**CONTRA COSTA  
WATER DISTRICT**

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California Department of Water Resources  
Division of Planning and Local Assistance  
Attn: Tracie Billington  
P.O. Box 942836  
Sacramento, CA 94236-0001

Dear Ms. Billington:

Contra Costa Water District (CCWD) appreciates the opportunity to review the Draft PSP for the Integrated Regional Water Management Implementation Grants - Step 2, and offers the following comments for your consideration.

Step 2 Application Requirements

- Overall, the amount of time and resources that will be required to complete and evaluate the Step 2 application seems excessive. To save time and money on both the State and applicant side, we feel less detail should be required for Step 2. At a minimum, if the information was asked for in Step 1, it should not be required again in Step 2.
- If it is determined that all 18 attachments are critical in making the final funding decisions, we feel DWR and SWRCB should consider only inviting applicants to fill out Step 2 applications if they are likely to receive funding (much like DHS is handling Chapters 3, 4, and 6).

Step 1 Selection Process

- At the workshop in Sacramento, DWR staff mentioned that they might ask applicants from overlapping regions to combine their proposals for Step 2. We feel strongly that this should not happen. In Step 1, the program guidelines gave applicants the flexibility to define and plan for their own regions. Requiring applicants in overlapping or adjacent regions to combine proposals for Step 2 would not only necessitate the regional planning process to begin all over again, but would also require a new prioritization process that would undoubtedly delay the entire grant process.
- Rather than requiring applicants to combine proposals, we feel it would be more equitable to rank every proposal as submitted according to the stated criteria, and fund the proposals that score the highest and best meet the requirements of the program.

### Proposal Grouping by Hydrologic Region

- Not only does the concept of consolidating grant proposals within hydrologic regions appear to be inconsistent with the program guidelines, but the hydrologic regions in general do not necessarily coincide with long standing water management planning efforts. For example, CCWD's East Contra Costa area has a long history of water management planning established on the basis of common water management challenges, compatible water supply sources and established inter-jurisdictional relationships. These foundations appear to be more in line with the grant criteria and intended use for the grant funds than an approach relying on hydrologic regions.
- We are concerned that an approach based on hydrologic regions would ignore significant multi-regional areas such as the Delta. According to the ranking criteria, projects improving the Delta are to be given priority.
- While we don't agree it is a prudent approach, if DWR decides to consolidate proposals into regions, it would seem most appropriate to have a Delta region.

We continue to appreciate your efforts to achieve a fair, workable funding program that meets the many goals and objectives of Chapter 8. Thank you for the opportunity to comment on the Step 2 Draft PSP.

Sincerely,



Jerry Brown  
Director of Planning