Ms. Tracie Billington and Mr. Joe Yun
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236
tracieb@water.ca.gov and jyun@water.ca.gov

May 14, 2014

**SUBJECT: Comments on the 2014 IRWM Drought Solicitation Guidelines and PSP, April 2014**

Dear Ms. Billington and Mr. Yun,

I am writing this letter to provide you with my comments on the April 2014 Drought Solicitation Proposal Solicitation Draft guidelines.

I have developed these comments following participation in various Round Table of Regions discussions, as well as conversations with participants in the Upper Pit River Watershed, Cosumnes American Bear Yuba, Greater Monterey and Yuba IRWM regions.

The following set of comments on the April 2014 IRWM Drought Solicitation Guidelines and PSP represent my own opinions, as I have not worked directly with any region to develop these remarks.

1. I strongly support allocating the $200 million in grant funds based on a proportional basis rather than an open, state-wide competition. I further suggest that the total amount granted to any one region not exceed 50% of the available funds remaining to that funding area.

   I make these suggestions for several reasons: open competition across the state in the past has largely favored the urban and more affluent regions, it is conceivable that large and well positioned IRWM regions could consume the bulk of funds remaining within a funding area– resulting in the remaining IRWM groups receiving no funding in the next round, the use of IRWM funds to support drought relief (while expedient) does not address any of the prioritization/issue

development/objectives/measurable outcomes that the IRWMs have worked so hard to develop in direct response to the 2012 guidelines, and finally, assuring that 50% of the remaining funds for each region are available in 2015 assures the ongoing viability of funding of some IRWM areas that have received no previous IRWM funding and/or which do not have projects that meet the requirements of the Drought funding cycle.

2. Knowing the capabilities and constraints of many of the northern and central California IRWM groups, I would suggest that the time frame for submittal of the application be extended to 60 days for the Grant Application Submittal Deadline.

   I know from close experience that coordinating a submittal, ensuring that the DAC and less affluent communities and sponsors have sufficient time to juggle their available staff, working with and between project sponsors and their respective RWMG can be time consuming. While DWR has done a superior job of reducing the necessary time investment for this grant cycle there are still hurdles for less advantaged communities and entities that the extra time would assuage.

3. Finally, many of the regions that I support in my consulting practice are financially constrained, are working hard to complete IRWMPs within existing planning grants, are in the throes of adoption, have not yet had a compliance review though they have completed their plans or/and are experiencing other similar circumstances. I well understand the need to assure that any given region has a compliant plan prior to awarding funding but would strongly advocate for an extension on the IRWM Plan submittal deadline to allow for regions that are grappling with these circumstances to comply within a parallel process or other mechanism.

Thank-you for the opportunity to comments on the guidelines. I know you are all swamped and I appreciate the constraints that will affect your ability to consider the multiple comments you will receive.

Sincerely,

Katie Burdick

Katie Burdick