



May 15, 2014

Ms. Tracie Billington  
California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
Post Office Box 942836  
Sacramento, CA 94236

Dear Ms. Billington,

The North Coast Resource Partnership (NCRP) appreciates the opportunity to provide input on the Draft 2014 Drought Grant Proposal Solicitation Package (PSP) and Draft 2014 IRWM Guidelines. We applaud California Department of Water Resources (DWR) for making expedited funding available to drought stricken parts of California. The North Coast has multiple communities that are facing severe water shortages and has a variety of projects which can immediately use the available funding to implement long term strategies to reduce drought vulnerability. Our comments below are focused on three elements of the draft Guidelines and PSP: 1) CASGEM compliance; 2) IRWM Plan adoption and 3) the Draft 2014 Drought Grant Proposal application due date.

**CASGEM Compliance:** While we understand and support the emphasis on plan adoption and CASGEM compliance outlined in the draft Guidelines and PSP, we are requesting that DWR take into account that the expedited nature of this funding round has accelerated these two processes in a way that is challenging for regions, especially economically disadvantaged regions such as the North Coast. We applaud DWR for taking into consideration the economically disadvantaged community (DAC) status of the service area when considering the CASGEM eligibility of a project proponent. The North Coast region is making rapid progress on meeting this requirement, and the accelerated nature of the expedited drought funding has created scheduling challenges for our economically disadvantaged region. We request that you consider whether substantial progress is being made towards CASGEM compliance when evaluating your funding awards, and require that the applicant and project proponents be compliant prior to executing a funding agreement, as opposed to fully compliant as a condition of funding award.

**IRWM Plan Adoption:** Although the NCRP is on track for plan adoption, and is in the process of scheduling County Board and Tribal Council meetings to consider plan adoption, we request some scheduling flexibility to allow regions to demonstrate substantial progress towards plan adoption and to make a commitment to ensure plan adoption prior to executing funding agreements. We expect that adoption would be complete for the North Coast IRWM Plan by December 2014.

**Draft 2014 Drought Grant Proposal Application Due Date:** The expedited nature of this funding round, along with the severe drought related needs of North Coast communities and the acceleration of requirements associated with CASGEM compliance and plan adoption place great strain on the limited capacity of our region's disadvantaged communities. The acceleration of the due date to 30 days from the typical 60 days after the finalization of the Guidelines/PSPs represents a severe hardship for North Coast DACs. We therefore request that DWR provide 60 days after the final Guidelines/PSPs to prepare the regional application.

We thank you for the opportunity to provide this input, and continue to appreciate and benefit from your support and guidance, your professional and helpful staff, and your agency's emphasis on high quality planning and project implementation in economically disadvantaged regions and throughout California.

Sincerely,



Jake Mackenzie, Policy Review Panel Chairman  
North Coast Resource Partnership

Copy:

Assemblymember Wes Chesbro  
Assemblymember Brian Dahle  
Assemblymember Marc Levine  
Congressman Jared Huffman  
Congressman Doug LaMalfa  
Congressman Mike Thompson  
Senator Noreen Evans  
Senator Ted Gaines  
Senator Jim Nielson  
North Coast Resource Partnership Policy Review Panel  
Margie Graham, California Department of Water Resources