

**May 15, 2014**

**To:** Keith Wallace, Project Manager, California Department of Water Resources  
[Keith.Wallace@water.ca.gov](mailto:Keith.Wallace@water.ca.gov)

**RE: Draft 2014 Drought Round IRWM Implementation Grant Solicitation Process Improvement**

Mr. Wallace,

Thank you for the opportunity to comment on the Draft 2014 Drought Grant Guidelines and Proposal Solicitation Package.

As you know, the IRWM Plan, Guidelines, PSP, and GRanTS requirements together pose an extraordinarily cumbersome, expensive, and onerous standard of eligibility for drought-impacted parties in need of assistance. And while it is extremely unlikely that this tremendously unfair and dangerous situation can be adequately addressed at this late date for the current round of funding, it nevertheless bears noting.

As far as recommendations for process improvement to the current round of funding, I would only suggest that the proposed deadline for submitting applications *not be significantly extended*. This is because it is too late to make meaningful changes to the process that would be beneficial to those truly in need. Two additional weeks should be adequate to accommodate any RWM Group members' requirements to meet internal protocols.

Apart from this round, I strongly urge you to consider meaningful changes to the process of distributing funds for water management projects that have been approved by and collected from California taxpayers—particularly for disadvantaged communities (DACs) who have been effectively shut out *yet have the greatest need*.

I suggest that the basis of a complete overhaul of the funding process involve a simple database-type application that need not be submitted over and over for each round of each Proposition or legislative amendment. At a minimum, this would give DACs a fighting chance to build records of information that can be utilized and augmented easily and inexpensively whenever grant funds become available. Ideally, it would preclude the need to generate thousands and thousands of pages of wasteful and unwieldy documentation again and again.

Additionally, there is no need to divide regions into management groups that must create memorandums of understanding to operate. This requirement neither ensures that proposed projects do not conflict nor is it necessary or helpful. There is a much better way to group regions that would not only preclude conflicts but enhance inclusion and potential benefits (i.e., the current grouping structure, while historical, is not helpful).

My company is available to help you study and implement the kinds of improvements I have briefly described here. Please contact me at your convenience if we can be of service or if you would like a more detailed proposal.

For your information, my company, Loowit Services LLC, is a women business enterprise engaged in environmental compliance reporting and business writing. I have 20 years of experience with

groundwater monitoring and remediation of Leaking Underground Fuel Tank (LUFT) cases in California, and I have dealt extensively with oversight agencies including Fire Departments, Water Districts and the Regional and State Water Resources Control Boards to manage LUFT cases as well as with the California State Reimbursement and GIS Geotracker database programs for LUFT cases.

Once again, thank you for the opportunity to comment and for all of the work you do to improve water quality, supply, and management in California.

Sincerely,

*Karen Petryna*

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