



**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 Grant Proposal Solicitation Package**

Mr. Wallace,

Thank you for the opportunity for the Sierra Water Workgroup (SWWG), to comment on the Draft 2014 Drought Grant Proposal Solicitation Package.

As you are aware the Sierra Nevada is a unique region that provides water, electricity and natural resources that are essential to local residents and to the state of California. Sierra watersheds supply 55% of water used statewide, offer prime recreation, provide habitat for half the animal and plant species of the state, and generate 55% of California's hydroelectric power. Climate change is already impacting California's water resources, and according to your agency, DWR further expects that a 25% reduction in snowpack by the middle of the century will impact California's water supply significantly. Climate change, drought and population growth will significantly impair water supply availability, reliability, quality, and ecosystem health in the Sierra and far beyond. Failure to take action to address these impending threats could lead to the deterioration of natural processes, water infrastructure, and public safety, resulting in significant economic and ecological consequences for California and the nation.

The SWWG IRWM's are looking forward to addressing these drought challenges by implementing projects and programs in the Sierra Nevada. The following comments, suggestions and questions represent the opinions of the **Tahoe-Sierra IRWM** and **Yosemite-Mariposa IRWM**, they are specific to the 2014 Drought Grant Solicitation process

### **Funding**

1. Establish Funding Area allocation so applications evaluated inter-regionally, NOT Statewide
2. All funding for a funding area shouldn't be allocated in this drought round, some should remain for other high priority needs within the IRWMs. Suggest that DWR apply a cap on the amount each Funding Area can receive in Round 3, so that large regions don't secure all remaining funds and there is some money left for 2015/Round 4 (especially for regions still in IRWM Plan development and for regions with DAC projects that aren't drought related)

- a. Suggest the cap be a proportion of Funding Area remaining balance – 50% per Funding Area, which would total \$225 million Statewide (Consensus). A 50% cap would result in the following caps on 2014 Drought per funding area:

<b>Funding Area</b>	<b>Remaining per DWR (PSP)</b>	<b>50% for Round 3</b>
North Coast	19,747,939	9,873,970
San Francisco Bay	73,483,858	36,741,929
Central Coast	19,748,065	9,874,033
Los Angeles-Ventura	96,340,789	48,170,395
Santa Ana	74,482,996	37,241,498
San Diego	56,512,951	28,256,476
Sacramento River	40,518,410	20,259,205
San Joaquin River	26,696,455	13,348,228
Tulare/Kern	16,217,196	8,108,598
Lahontan	10,705,051	5,352,526
Colorado River	16,700,000	8,350,000
<b>Total</b>	<b>451,153,710</b>	<b>225,576,855</b>

- b. Suggest the cap be tied to the Funding Area with greatest need – allowing that one to burn 100% in Round 3 (NO consensus)

## Timeline

3. Extend application deadline beyond 30 days from Final PSP release –suggest 45-60 days
4. Adoption timeline for Round 2 Planning Grant Recipients should be clarified – it is not clear whether DWR review needs to occur before adoption. If DWR review is before adoption, then adoption schedule for eligibility needs to be relaxed

## Point System

5. Areas with significant DAC population and/or low population density should be graded on a lower scale than urban areas
6. Human Right to Water – Supportive of concept, but concern how points will be allocated when some regions serve 98% of residents through public agencies
  - a. Need clarity on exactly how the points will be applied
7. Impacts of Drought – Need clarity on how they’re going to evaluate “identification of regional water impacts from drought” for 10 points (of 18 points!)
8. Tie breaker points – How applied? Through program preference write-up.

## Need Clarification

9. CASGEM – How will this requirement will be applied
  - a. Some lead RWMG agencies are not eligible monitoring entities; Others may be eligible but don’t have resources to properly implement monitoring and don’t want to ‘let down’ their stakeholders due to CASGEM compliance

- b. Should disconnect the Drought Solicitation from CASGEM because it is counter-productive to the drought goals of the State
  - c. LPSs shouldn't be deemed ineligible (even if they are eligible monitoring entities) if their projects don't affect groundwater
10. UWMP and AWMP compliance – Some rural regions have difficulty complying
11. Conservation Measures that are NOT Locally Cost Effective – Rebate and outreach programs are discouraged; Leak detection and repair are encouraged
- a. But small rural communities do need additional funding for rebate and outreach programs (not CUWCC members) – Any way to make this case?
  - b. Can there be an exemption for conservation programs geared toward DACs?
  - c. Alternative – Select “Drought Preparedness” category, which also includes conservation efforts
  - d. What about agricultural irrigation efficiency coupled with recycled water service to agriculture?

### **Economic Analysis**

12. Thank you to DWR for removing the economic analysis and for being so helpful with our questions!
- a. Cost-savings associated with removing the economic analysis – estimated 30% for one region.

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

Sincerely,  
Liz Mansfield, *Director of Sierra Water Workgroup*

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### ***Tahoe-Sierra Integrated Regional Water Management***

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