
From: Billington, Tracie@DWR
Sent: Monday, March 17, 2014 8:46 AM
To: Wallace, Keith@DWR; Eusuff, Muzaffar@DWR; Yun, Joseph@DWR
Subject: FW: Sunday evening thoughts on the IRWM drought funds

From: Kristopher Tjernell [mailto:ktjernell@csgcalifornia.com]
Sent: Sunday, March 16, 2014 7:52 PM
To: Billington, Tracie@DWR
Cc: Mark Drew; Tasha Newman; Schimke, Kasey@DWR
Subject: Sunday evening thoughts on the IRWM drought funds

Dear Tracie,

On behalf of California Trout, I'd like to pass along some thoughts that we hope will be helpful as you and your team work to maximize the efficiency and effectiveness of the recently-appropriated IRWM funding. Specifically, California Trout would like to provide suggestions for the implementation of the \$200 million appropriated for urgently needed drought-related projects. As one of the state's strongest IRWM Program supporters, the lead organization in the Inyo-Mono IRWM effort, and an ardent believer in the fundamental value of truly integrated water management, we have a vested interest in seeing funds hit the ground in the most effective way possible. Thank you for your dedication to this important program and for taking these thoughts under consideration.

Suggested principles to guide the granting of the expedited funds:

- *General: Minimize costly process and requirements for plan revisions in order to maximize grant-round success.* The urgency driving Senate Bills 103 and 104 (Steinberg) originated from the fact that communities across California – urban and rural, wealthy and disadvantaged – are all suffering from the impacts of the current drought. While no community has been left unscathed, many small rural communities, tribal communities, and disadvantaged communities are suffering disproportionate hardship. These are the same communities whose IRWM planning efforts generally have fewer resources immediately available to dedicate towards updating complicated IRWM proposals, plans, etc. We urge you to consider a grant solicitation characterized by clear intent, straightforward process, and minimal revisions to already-adopted IRWM plans.

- *Minimize hurdles for both DWR and funding applicants in the path towards expedited grants.*
 - o We urge you to consider foregoing requirements for consistency with the 2012 Planning Standards and the Plan Review Process. Instead, consider using eligibility for the Round 2 grant cycle as a threshold for eligibility for these expedited funds. Regions, regardless of whether they were successful in Round 2, could in relatively short order re-prioritize already-adopted projects using drought-relief criteria. This re-prioritization from within existing plans would help ensure high-quality local projects, a more affordable application process, and a more reasonable

number of factors for DWR's consideration. A minimization of workload would also help ensure that DWR IRWM grant contracts currently underway would not need project budget amendments and project scheduling amendments.

- o Alternatively, please consider a simple process for quickly determining eligibility for the expedited funds. Initial DWR consideration of basic project descriptions, drought applicability, and other thresholds would allow less resource-rich regions to determine if participation in the expedited round is the best use of limited resources and time.
- o Additionally, we urge you to consider providing regions with very clear guidance if technically difficult calculations such as 'benefit/cost ratios' are to be required. One option: make technical assistance available for regions throughout the expedited grant round process.

Ensure investments in disadvantaged communities to assist those most in-need. We urge you to consider directing a significant portion of the expedited funds to disadvantaged communities, small communities, tribes, and others affected by drought conditions where local financing is most challenging.

California Trout and the Into-Mono Program are absolutely dedicated to helping the Integrated Regional Water Management Program be successful. It's our aim to help develop and strengthen the basic tenets of integrated water management in the Eastern Sierra and beyond. Just as the acknowledgement of complex and varying local infrastructure and hydrology is necessary to implement a program like IRWM, so is an acknowledgement that the resources available to each region vary tremendously. It's our hope the these comments and suggestions for the expedited funds will help you develop a grant round that recognizes the diversity in statewide needs and therefore is approachable by the greatest number of IRWM planning efforts. Please let us know if you have any questions about this suggested approach.

Many thanks, Tracie.

-Kris