

# REGIONAL WATER MANAGEMENT FOUNDATION

*a subsidiary of Community Foundation Santa Cruz County*

March 21, 2014

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

**SUBJECT:        Comments on Proposed Language of Draft Guidelines and PSP for Expedited Prop 84 Drought Funding**

Dear Ms. Billington and Mr. Yun:

The Santa Cruz IRWM Region has been active and participatory in the IRWM program since its inception and has benefited through Propositions 50 and 84. We are grateful to DWR staff for their on-going communication and interest in obtaining and integrating feedback on the IRWM program, specifically as it is related to the expedited Prop 84 funding enabled through the passage of SB 104. The Santa Cruz Region has also been working in coordination with SLO and Santa Barbara IRWM Regions on comments on the Draft Language for the Guidelines and PSP for Expedited Prop 84 Drought Funding. We are, however, submitting individual letters.

1. Our regions are in strong support of allocation of the \$200 on a proportionate regional level as opposed to a statewide competition for funds could be used up by a few projects or regions. While a statewide funding formula would allow for all regions to identify priorities to submit for emergency funds, different regions are affected differently and a statewide competition may not provide a level playing field, especially for those regions that had a smaller allocation under Prop 84 in the first place. Further, a regional allocation formula can give regions more certainty when requesting funds. .
2. Our regions would request and support DWR scoring methodology or criteria methodology that provides funding priority to those regions facing the worst drought conditions. The entire the hydrologic region is categorized as D4, or extreme drought, by the National Oceanic and Atmospheric Administration and the National Drought Mitigation Center and many of the IRWM regions in the hydrological area have also declared local drought emergencies.
3. Based on the discussions which occurred during the Roundtable of Regions call on March 18, we understand that DWR is considering language that would enable reimbursement of costs for a project that may be underway before the disbursement of funds. Our regions strongly support authorizing reimbursement – specifically using the date of the statewide and/or local drought emergency announcement as the threshold for claims for reimbursement.

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4. Expedited funding: the California Legislature appropriated the remaining \$472 million of Proposition 84 funds for drought relief, \$200 million of which are expedited funds targeted for drought preparedness / response projects. We support the concept of expedited funding for relevant projects, particularly in light of the current drought. However, the IRWM program does not lend itself to an expedited process, particularly with respect to extensive and costly application requirements. Requiring an adopted and DWR-approved plan prior to application submittal will only increase these burdens. An expedited round of funding should follow a separate streamlined application process that removes many of the administratively burdensome and costly conditions of the prior solicitations. We also recommend that this funding is contingent upon a region having an adopted and approved IRWM plan update prior to grant execution rather than when applications are due or awards announced.
5. Grant preparation costs: Depending on how the expedited round of funding is conducted; it may require regions to respond rapidly with detailed cost benefit and technical analysis, among other proposal requirements. Such a rapid response would be difficult for many regions given staffing levels and existing workloads. As such, we recommend that region's awarded a grant are allowed to submit costs associated with grant preparation for reimbursement under the grant, or at a minimum, eligible to be counted as match.
6. Number of funding rounds: We understand that DWR is contemplating the number of rounds needed to allocate the remaining IRWM funding in light of the expedited drought funding. We support two rounds of funding – one for the expedited drought funds, and one for the remaining IRWM funds.
7. In order to facilitate expedited project implementation, we request that separate State level review as part of the funding award not be required when CEQA analysis has been completed at the local level.
8. Our regions are not supportive of DWRs consideration of participation in CASGEM as a requirement nor are we supportive of prioritizing IRWM regions or jurisdictions implementing CASGEM. While some of our regions and jurisdictions do participate in this voluntary program, CASGEM is not uniformly implemented and the program, is differentially applied and often evolving. We do not feel this is a reliable metric or requirement to apply. Many regions have on-going and equivalent monitoring programs that provide the same detail and amount of information as CASGEM.

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Thank you for considering the County of Santa Cruz's comments on the basin prioritization process. We welcome the opportunity to work with DWR staff to address these concerns.

Sincerely,



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**Susan Pearce**

**Executive Director, Resource Conservation District of Santa Cruz County**



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**Piret Harmon**

**General Manager, Scotts Valley Water District**



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**John A. Ricker**

**Water Resources Division Director, Santa Cruz County**

