



Greater Los Angeles County
Integrated Regional Water Management

April 22, 2015

California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
P. O. Box 942836
Sacramento, CA 94236

Attention Zaffar Eusuff

**COMMENTS ON THE DRAFT 2015 INTEGRATED REGIONAL WATER
MANAGEMENT PROGRAM GUIDELINES AND PROPOSAL SOLICITATION
PACKAGE**

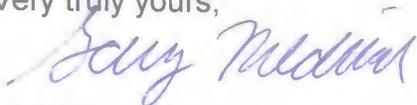
On behalf of the Greater Los Angeles County, Upper Santa Clara River, and Watersheds Coalition of Ventura County Integrated Regional Water Management (IRWM) Regions, we appreciate the actions taken by California Department of Water Resources (DWR) to minimize the changes within the new IRWM Guidelines and Proposal Solicitation Package (PSP) by eliminating resubmittal of eligibility documentation for applicants, streamlining the Project Justification section with the removal of the technical documentation, and limiting the benefits presentation to two main benefits and the costs associated with them. We also want to take this opportunity to offer the following comments for your consideration:

- **We believe that this final Round of Proposition 84 funding would have greatly benefited the Regions and especially its Disadvantaged Communities** by allowing more time to work closely with Disadvantaged Communities stakeholders to identify the best suite of projects, allow for development of interregional projects in our funding area, and facilitate a more successful grant application that not only promotes multibenefits but also addresses long-term drought preparedness and long-term water supply reliability. We respectfully request that future IRWM grant solicitations provide IRWM Regions with ample time to prepare the application to include the best suite of projects.

- **This final round of funding should result in applications that contain longer-term projects that may benefit from more constructive work plan development in order to be ready for construction in the spring of 2016.** The 2014 Drought Grant Solicitation already included projects that were critical for addressing the State's current drought conditions through projects focused on demand management and those that were shovel ready.
- **We urge you to consider State Revolving Fund money (i.e. repayments of Clean Water State Revolving Fund financing) as an eligible part of the "local share" when calculating the match provided by the project proponent and request that DWR reflect this change in the PSP for the 2015 IRWM Grant Solicitation.** Currently, page 34 of the 2015 IRWM Grant Solicitation PSP states, "State Revolving Funds (SRF) is considered State funds; therefore, cannot be used as funding match..." As you may be aware, the recent release of the Draft Proposition 1 Water Recycling Funding Program Guidelines includes SRF as local match. Specifically, page 9 states that "Repayments of CWSRF financing may be used as all or part of the local match." While it is true that initially the SRF funds provided to a local agency are "State funds," these funds are actually loans (and some are Federal funds), which are ultimately repaid by user fees making them local funds not State funds. For this reason and to remain consistent with another State grant funding program, it seems reasonable to consider SRF funding as eligible local match.
- **Table 10 – Scoring Criteria, on page 27 states that all projects completed by October 31, 2020, receive 2 points and on page 28 a project that is completed by October 31, 2019, receives 1 point.** It will be important to clarify if an applicant can potentially receive a total of 3 points if they have projects that meet both end dates.

If you have any questions, please feel free to contact Mr. Russ Bryden, Greater Los Angeles County IRWM Region at (626) 458-4334 or rbryden@dpw.lacounty.gov, Mr. Jeff Ford, Upper Santa Clara River IRWM Region at (661) 513-1281 or jford@clwa.org, or Ms. Sue Hughes, Chair, Watersheds Coalition of Ventura County IRWM Region, at (805) 654-3836 or susan.hughes@ventura.org.

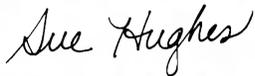
Very truly yours,



GAIL FARBER
Chair

for

Greater Los Angeles County
Integrated Regional Water Management Region



SUE HUGHES
Chair

Watersheds Coalition of Ventura County
Integrated Regional Water Management Region



DAN MASNADA
General Manager
Castaic Lake Water Agency
Upper Santa Clara River Region
Integrated Regional Water Management Region