



April 24, 2015

California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
Post Office Box 942836  
Sacramento, CA 94236  
Attn: Zaffar Eusuff

Deb Sedwick, Chair  
Spencer Short, Vice  
Chair

**Members**

California American Water  
Carmichael Water District  
Citrus Heights Water District  
Del Paso Manor Water District  
El Dorado Irrigation District  
Elk Grove Water District  
Fair Oaks Water District  
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Golden State Water Company  
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Orange Vale Water Company  
Placer County Water Agency  
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Roseville, City of  
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Water District  
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Agency  
Sacramento Suburban Water  
District  
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**Associates**

El Dorado County Water  
Agency  
Sacramento Municipal Utility  
District  
Sacramento Regional County  
Sanitation District  
Sacramento Area Flood  
Control Agency

Dear Mr. Eusuff:

As the Regional Water Management Group for the American River Basin Integrated Regional Water Management (IRWM) Plan, Regional Water Authority (RWA) appreciates the opportunity to comment on the 2015 Proposal Solicitation Package for Implementation Grants Funded by the Department of Water Resources. Our comments are specific to the scoring criteria in Table 10 of the guidelines:

1. Program Preferences points should be included as part of the criteria for the Proposal Level Evaluation, rather than used as a tie-breaker. In addition, they should be increased to a minimum of 5 points. Program Preferences is a concept that ensures that proposals seek to provide broad benefits to as many IRWM stakeholder interests (water supply, water quality, habitat, flood, etc.) as possible. By de-emphasizing the breadth of benefits of a regional proposal, regional stakeholders representing a variety of interests will become disenfranchised with the IRWM process. This is counterproductive to DWR's desire to sustain IRWM within regions throughout the State. By moving these points to the Proposal Level Evaluation, DWR also has additional criteria through which it can differentiate between proposals.
2. The points for "long-term drought preparedness" and "direct water-related benefit to a DAC" should be either eliminated or reduced as part of the Project Level Evaluation. These criteria are already part of the Program Preferences. By having relatively large point values associated with these two criteria, they will effectively be one of the largest differentiators between successful and unsuccessful applications for funding. As such, IRWM groups will likely over-emphasize these types of projects, and IRWM regions will feel compelled to exclude other worthy projects. DWR's goal is to have IRWM group identify and prioritize integrated projects within their respective regions. The approach in the draft PSP is counter-productive to that goal.

Thank you again for the opportunity to comment.

Sincerely,

Robert J. Swartz  
Manager of Technical Services