



Santa Ana Watershed Project Authority

OVER 45 YEARS OF INNOVATION, VISION, AND WATERSHED LEADERSHIP

One Water One Watershed

AWRA INTEGRATED WATER RESOURCES MANAGEMENT AWARD

HARVARD KENNEDY SCHOOL'S TOP 25 INNOVATIONS IN AMERICAN GOVERNMENT



April 21, 2015

Donald D. Galleano
Commission
Chair

Mr. Zaffar Eusuff
Program Manager
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236

Celeste Cantú
General
Manager

Re: 2015 IRWM Implementation Grant Program – Draft Proposal Solicitation Package and Guidelines Comments

Orange
County
Water
District

Dear Mr. Eusuff,

Western
Municipal
Water District

We appreciate the opportunity to provide comments on the 2015 Integrated Regional Water Management (IRWM) Grant Solicitation Proposal Solicitation Package (PSP) and Guidelines. We are hopeful that you find these comments helpful from the Santa Ana Watershed Project Authority, SAWPA, the regional water management group for the Santa Ana IRWM region and funding area.

Eastern
Municipal
Water
District

Integrated Water Management is, in our opinion, the most important strategy as we confront 21st Century water challenges. This IRWM program must facilitate the implementation of this strategy if California is to thrive. Every opportunity needs to be taken to make the program accessible to the water resource managers while protecting the standards of IRWM. We are concerned that many of administrative decisions have had the result of undermining the promise of Integrated Water Management.

San
Bernardino
Valley
Municipal
Water
District

- 1) Waive Scoring for One IRWM, One Funding Area.** Our most significant comment that we have strongly encouraged DWR to address on multiple occasions in previous comments regarding Prop 84 IRWM Implementation grant program solicitation process improvement relates to deferring project selection to local IRWMs. SAWPA, as the sole IRWM region for the Santa Ana funding area, should not be competitively scored statewide in accordance with Prop 84 legislation and the Public Resource Code (PRC). If DWR implements the statutes accordingly, competition would be limited to areas with more than one applicant in a Funding Area. DWR should review our application only for consistency with the law and the principals of IRWM. This is reflected under PRC 75028: *The department shall defer to approved local project selection, and review projects only for consistency with the purposes of Section 75026.* PRC §75026 states that DWR should request

Inland
Empire
Utilities
Agency



only information necessary to confirm that a grant application project is consistent with the local IRWM Plan, provides multiple benefits, and helps to achieve DWR's program preferences.

SAWPA/OWOW is the only applicant in the Santa Ana Funding Area because early on SAWPA and the Santa Ana River Watershed's stakeholders understood the importance of being unified. Through the Regional Acceptance Process, we worked hard to form one Integrated Regional Water Management Group. SAWPA developed and implemented the integrated regional planning process—which was not always popular with all stakeholders—because we believed it was our responsibility to the State and to our own region.

In review of the Guidelines, we see that DWR still intends to use a statewide competitive scoring process for all applicants rather than following the Public Resource Code pertaining to Prop 84 Chapter 2. Further, no mention is made in the Guidelines or PSP of deferring to local IRWM region governance. We believe that deferring to the local IRWM region governance to assess projects would be an effective way to expedite the grant funding process. A statewide scoring process to make funding decisions thwarts the intent of Prop 84 Chapter 2 and the SB 104. We recommend that all scoring criteria for the IRWM projects submitted under the 2015 grant solicitation be waived for those funding areas with one IRWM region.

As an alternative approach that would assist DWR to address these concerns and still meet their required mandate to ensure eligibility and completeness, we would suggest assigning a Pass/Fail to any IRWM with one Funding Area similar to how DWR evaluated the IRWM plans for acceptance under IRWM Plan Guidelines. The Pass/Fail approach would simplify the screening process by DWR for eligibility and completeness and save several IRWM regions as well as DWR time and money.

2) IRWM Grant Application Deadline

A specific and extensive set of project review criteria, rating and ranking, and stakeholder involvement requirements are required for all IRWM regions to conduct in considering projects for inclusion in the IRWM plan as defined in the Guidelines on pg. 43 - 46. Most IRWM regions update their IRWM plan's rated and ranked project list as part of Prop 84 IRWM grant opportunities that arise. The project selection process can take several months to conduct properly in an open, transparent and fair manner. For several months prior to the release of the draft 2015 IRWM Implementation grant PSP and Guidelines, DWR posted their Implementation Schedule for the 2015 grant program on their website. Originally, DWR indicated that the grant applications would be due in the fall of 2015. However, now the draft PSP and the new schedule reflect a grant application deadline in the summer, the first week of August 2015. This will only allow two

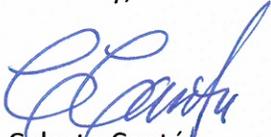
months for the IRWM regions to prepare their project selection process. We recommend that the grant application submittal date be deferred to the end of September 2015. This would allow our governance, which includes elected officials, and a project review committee comprised of unbiased water resource-related experts, time to adequately vet the proposals. Time will also be needed to compile the vetted projects and programs proposed to our governance, which individually can differ in scope due to the variability of IRWM projects, into one application for submittal to DWR.

- 3) Streamlining.** Our staff was pleased to see efforts to streamline the grant application as described in the PSP. To further reduce DWR staff review time and DWR labor savings, we suggest that similar to the new applicant information being waived if the applicant had applied for a grant after January 1, 2012, we suggest a documentation waiver also be applied to numerous other compliance documents that eligible past IRWM project proponents had to submit previously under the prior IRWM grant submittal. This compliance documentation would include documents such as Urban Water Management Compliance, Agricultural Water Management Compliance, Surface Water Diverter Compliance, Groundwater Management Compliance and CASGEM Compliance. It seems unnecessary, time consuming and costly to again submit the very same documentation submitted for past project proponents under the last round of IRWM Implementation grant funding.
- 4) Consideration of Innovation.** Under the process improvement workshop, DWR stressed that they were looking to recognize and support innovation. Based on our review, there is no evidence that this has occurred. In review of the scoring criteria, no mention is made of points provided for projects that reflect innovation, expanded collaboration and integration, or support for pilot scale projects. All these concepts have been stressed in prior comments to the DWR. As part of an IRWM region's long term water resource management, IRWM regions should be considering these types of projects and supported with grant funding to implement even with expedited time schedules. We recommend that DWR include text to encourage this in the PSP. Similar to previous comments, for our region with one IRWM for the Funding area, we recommend that DWR defer to our local IRWM governance to support projects that are innovative, system-wide, integrated and collaborative in the project selection process without DWR project scoring.
- 5) Project Performance Monitoring Plan/Work Plan**
On page 20 of the PSP, we noticed that the project applicant is required to prepare and submit a Project Performance Monitoring Plan for each project of the grant application. However, under the Exhibit A Work Plan, pages 29 and 32, a project performance monitoring plan is listed as an item to be developed as part of the future project work tasks. If the monitoring plan is a required deliverable

for the grant application, it should not be reflected as a future work item in the Work Plan.

We hope that you find these comments helpful. If you have any questions regarding these comments, please let us know.

Sincerely,



Celeste Cantú
General Manager