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

Re: Comments on the 2015 Proposition 84 Guidelines and PSP

Dear Zaffar,

The following constitutes the comments from the Yuba County IRWM Region on the Draft 2015 IRWM Guidelines and the Draft 2015 IRWM Implementation Grant PSP.

The comments were formulated following participation in the 4/17/15 Webinar presented by DWR, as well as deliberations by the governance group (Regional Water Management Group/RWMG) for the region. A primary comment and several Guideline- or PSP-specific comments follow.

Primary Comment

With respect to the scoring criteria (Table 10, Scoring Criteria, page 27 and 28, under heading VI), the Yuba County IRWM – RWMG specifically requests that DWR add a scoring component that recognizes the unusual position that Round 2 Planning Grant entities (such as theirs) face in this last round of Prop 84 funding.

The YUBA RWMG's primary concern is addressing the inequities between regions that were Round 1 Planning Grant recipients and those that received Planning Grants in Round 2. Due to the timing of the solicitation and award of the Round 2 Planning Grants, many Round 2 regions have not been eligible to apply for implementation funds as they developed and adopted their respective IRWMPs. Thus, this final round represents Round 2 regions' first and only opportunity to apply for implementation monies under Proposition 84. In the meantime, many Round 1 planning grant entities have been successful in two or even all three of the previous funding rounds. This inequity could be addressed by awarding extra points to those regions that were ineligible to apply in the previous rounds due to their Round 2 status.

Comments specific to The Guidelines/PSP

I. Draft 2015 Program Guidelines
   a) In Appendix G of the Guidelines (under the Heading "Determining the DAC Status", page 82 paragraph 3, numbers 2 and 3), please describe the difference in meaning between the

word "contained" and the word "inscribed" with respect to designating a DAC. We are not certain of the implications of the “inscribed” in the context presented.

b) For this same section (Appendix G), please confirm that alternative methods for DAC designation can be applied, other than using the DAC mapping tool. Methods could include both local actions, such as direct income polling, or actions by other Fedral or State agenices in confirming the DAC status (perhaps through award of a grant targeted to DAC status).

II. Draft 2015 Implementation Grant PSP Guidelines

a) For Attachment 2 – Project Justification, Project Physical Benefits and Technical Analysis of Benefits Claimed, pages 18 and 19: Can observed and/or estimated losses (e.g., field notes, photos, observations, professional estimates) be acceptable for supporting physical benefits claimed, particularly for DACs which may not have the funds to perfom a formal technical analysis?

For instance, in the hypothetical event that DAC staff observe a water tank clearly leaking due to the tank’s age and condition, the staff conclude the tank needs to be replaced. The DAC staff photograph the tank leaking and perform a rough estimate of annual water loss due to leakage. Is this type of evidence sufficient to support and demonstrate the physical benefit claimed as a result of tank replacement? If not, what level of technical analysis would be deemed adequate?

Please feel free to contact me directly if you need clarification on any of the RWMG comments. I can be reached at the following numbers: (530) 823-1310 office or cell (530) 906-1335

Sincerely,

Katie Burdick
Consultant Representing the Yuba County RWMG