



## INTEGRATED REGIONAL WATER MANAGEMENT PROGRAM

August 24, 2012

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

Dear Mr. Eusuff:

We are writing to submit public comments for the draft 2012 IRWM Guidelines and the draft Round 2 Implementation PS P on behalf of the Inyo-Mono IRWM Program Office. We appreciate the opportunity to participate in the development of these documents.

### **Draft 2012 IRWM Guidelines**

#### General Comments:

- In the Inyo-Mono IRWM region, we are continually trying to find the balance between meeting DWR's requirements for IRWM Plans and grant proposals, and prioritizing the region's specific needs and issues. While we appreciate DWR's guidance in developing the IRWM process in each region, we find that the Statewide objectives and priorities in IRWM are often quite different from our uniquely-located region. As such, we are finding that the IRWM Plan Standards are becoming increasingly heavy-handed and top-down, and the required effort to meet these rigorous Plan Standards leaves us little time to focus on truly regional priorities. We understand that some standards and guidance are required to meet legislative mandates, but we suggest minimizing the requirements as much as possible to allow regions to direct the structure and content of their IRWM Plans. One example of this is in Table 7 (p. 70; Requirements for addressing climate change within existing IRWM Plan Standards). This indicates that climate change impacts should be addressed within the Region Description. In our IRWM Plan, we have a chapter dedicated solely to an analysis of climate change in the region. We would like the ability to choose where to best address climate change in our region's Plan.
- We find it confusing that there is some initial guidance on Plan Standards in Section IV – General Program Requirements, but then the full description and requirement of each Plan Standard are in Appendix C. We suggest minimizing the description of Plan Standards in Section IV and instead simply provide a list in that section and reserve the descriptions/guidance for Appendix C.

- The guidance for the Data Management and Technical Analysis standards contains a good deal of overlap. We suggest combining these two Standards into one Standard. We have found that it makes the most sense to include both these Standards into one chapter in our IRWM Plan.
- Similarly, we combine the Relation to Local Water Planning and Relation to Local Land Use Planning into one chapter, as it makes sense to analyze other planning efforts in a more integrated way (including both water and land use planning). We recommend combining these two Standards into one Standard.
- There are numerous grammatical errors throughout the document. Some of them have been noted below, but we suggest having one person proofread the entire document before the Guidelines are finalized. We respectfully submit the following specific comments regarding grammatical use in the draft guidelines.

Specific Comments:

- Page 13, Section G. Competition, second paragraph, second sentence. This sentence begins with “So each grant application...” This language is very colloquial. Suggest instead beginning with “Each grant application...”
- Page 13, Section A. Eligible Grant Applicants, second paragraph, last sentence. Here the phrase “project sponsor” is used. In other places in the Guidelines and Implementation PSP, “project proponent” is used. We would request that one term is chosen and consistently used to eliminate any confusion about the meaning of this term.
- Page 14, first bullet, second sentence.  
Old: “Consistency means, implementation projects...”  
New: Consistency means **that** implementation projects...”
- Page 15, second bullet, last sentence.  
Old: “...requirement also limits counties and various entities...ability”  
New: “...requirement also limits counties**;** and various entities**;**...ability”
- Page 17, last sentence under Ahwahnee Water Principles: “Over arching” should be one word.
- Page 18, second sentence, last bullet (carries over onto next page). This sentence should begin with “Include” instead of “Including”.
- Page 20, the sentence just before 7. Impact and Benefit.  
Old: “...keeping in consideration of the unique goals...”  
New: “...keeping in consideration the unique goals...”
- Page 22, second bullet under 16. Climate Change. This sentence is unclear. Is the process to choose between project alternatives and mitigation strategies? Or is it that the process should consider GHG emissions and potential mitigation strategies when choosing among project alternatives? Please clarify.
- Page 29, first sentence, Beneficial Uses definition.  
Old: “...the uses of streams, lakes, rivers, and other bodies, have to humans and other life.”  
New: “...the utility of streams, lakes, rivers, and other waterbodies to humans and other life.”

- Page 35-36, Governance Standard. The hierarchy of bullets is unclear under “Description of how governance addresses and ensures various activities.” Are the bullets starting with “Effective decision making” supposed to be under this heading, or are they their own bullets? The heading above suggests that there is more than one activity, but the only clearly labeled activity is “Public Involvement Process.”
- Page 41, Quantitative Measurement in Example 2. It seems that the Quantitative Measurement should be nitrate concentration and not water quality sampling.
- Page 44, second bullet under Documenting the Process. Similar to the first bullet in the General Comments section, the requirement to consider all CWP RMSs (p. 43) indirectly suggests that region-specific RMSs and priorities are less important than Statewide priorities. Several of the RMSs in the CWP are not applicable to our particular region, and it would be a better use of our time to determine our most important regional RMSs than to spend time considering those that are not applicable.
- The word “data” is plural. In some parts of the document, the word is used correctly (such as “data are”). In other cases, it is used as a singular noun, and these uses need to be corrected.

## **Draft Implementation PSP**

### General Comments:

- We would like to see more specific Bond Management System guidance in the PSP so that applicants more clearly know what to expect once they access the system. One example of this is to provide a word/character count for each field in BMS as it is explained in the PSP. Also, where appropriate, it would be helpful to know what options are provided in drop-down fields in BMS (such as Benefit Type).
- Please reference the general comment in the Guidelines section of this document regarding comments about proofreading the document to correct grammatical errors.
- “Supporting documentation” is mentioned numerous times throughout the document, mostly in relation to the Work Plan, Budget, and Technical Justification of Projects. We are looking for more guidance on what constitutes supporting documentation and how much should be provided in the application. For instance, should all documentation relating to a project be provided as part of the application? We received fairly vague guidance on this topic in the Round 1 Implementation proposal process, and then we found that part of our low score was because we did not provide sufficient supporting documentation. Our intent is to provide sufficient documentation but not necessarily inundate the DWR with irrelevant information.
- We very much appreciate DWR’s willingness to work with IRWM regions and receive their feedback regarding the economic analysis portion of the PSP. We feel that the options provided will relieve some of the burden on project proponents who do not have the capabilities to develop a full and quantified benefit-cost analysis. However, we are still concerned about the weighting of the Benefits and Costs Analysis (p. 29). The scoring of this criterion comprises 37.5% of the total score. We would like to see this criterion weighted at 25% or less of the total score (understanding, of course, that this provides an essential and simple measure of the use of bond funding). In addition, the

Technical Justifications of Projects criterion is quite similar to the calculation of benefits required in economic analysis section of the Round 1 Implementation proposal. The scoring for these two criteria constitutes 50% of the total possible score. We feel that the Work Plan, Budget, and Schedule should be weighted more heavily as compared to the benefits and costs criteria.

- Regarding Cost Effectiveness Analysis, it is unclear if the project proponent is required to provide a full analysis comparing a suite of projects that could, in theory, achieve the same benefits or not. It would be helpful to include more detail in this regard, particularly project proponents to be able to adequately answer questions included in Table 11. Statement of Cost-Effectiveness.
- As noted above we greatly appreciate DWR's willingness to provide a "sliding scale" for the benefit-cost analysis requirements. However, in Section D2- Non-Monetized Benefits Analysis-it is noted that "points awarded for Section D2 may be reduced if DWR determines that the benefits described could readily be quantified in dollar terms." For many smaller projects or for project proponents lacking capacity to prepare sophisticated economic analyses there remains an issue of whether a proponent that is preparing a non-monetized benefit analysis has complete knowledge of what can or may not be able to be quantified, let alone "readily" quantified. Having more specificity about what constitutes "readily" would be useful.

#### Specific Comments:

- Page 9, Maximum Grant Amount. In this section, it is explained that DWR is obligated to award \$25 million through Implementation Rounds 1 and 2 to projects that address critical water needs of disadvantaged communities. It is not clear from this explanation, and it would be helpful to know, what amount of funding will be allocated to DAC projects in Round 3.
- Page 14, 2<sup>nd</sup> checkbox (Watershed(s)). The guidance states "If your proposal covers multiple hydrologic regions..." Is this correct, or should it state "If your proposal covers multiple **watersheds**...?"
- Pages 26 and 28 (Table 5). Is it possible to include the Standard Scoring Criteria for the Work Plan and Monitoring, Assessment, and Performance Measures criteria directly in this table rather than referring the user to the 2012 Guidelines? This extra step of including them would save time on the part of applicants rather than having to refer to the Guidelines.
- Page 43, second paragraph in Exhibit D. "...that applicants ensure that **the analysis of benefits and cost analysis** are consistent..." This is awkward phrasing. Suggest rewording this sentence.
- The word "data" is plural. In some parts of the document, the word is used correctly (such as "data are"). In other cases, it is used as a singular noun, and these uses need to be corrected.

Again, we appreciate the opportunity to provide these comments and looking forward to continuing our work with DWR.

Most Sincerely,

A handwritten signature in cursive script that reads "Holly Alpert".

Holly Alpert  
Program Manager, Inyo-Mono IRWMP

A handwritten signature in cursive script that reads "Mark Drew".

Mark Drew  
Program Director, Inyo-Mono IRWMP  
Program Manager, Eastern Sierra California Trout Office