



SIERRA NEVADA ALLIANCE

*Keeping light in the range.*

**Via Email**

**October 9, 2013**

**To: Keith Wallace, Project Manager, California Department  
of Water Resources**

**[Keith.Wallace@water.ca.gov](mailto:Keith.Wallace@water.ca.gov)**

**RE: Proposition 84 Round 2 IG Draft Funding Recommendations and Proposal Evaluations**

Mr. Wallace,

Thank you for the opportunity for the Sierra Nevada Alliance to comment on the IRWMP Implementation Round 2 funding recommendations. While we are pleased that some IRWM Programs in the Sierra Nevada region received funding recommendation, we are concerned that a number of the Sierra IRWMs did not receive funding due to the scoring system used by DWR. I believe that there are two primary reasons Sierra IRWMs have a hard time competing with IRWMs serving larger populations and undertaking large infrastructure projects:

1. The IRWM project grading system does not effectively weigh proportion of DAC communities to overall population, taking into account regional importance. It just looks at costs and benefits to the overall population served. This makes it very difficult for regions with smaller populations to compete with the large urban centers on the CBA part of the scoring.

Headwater regions in California are critical to maintaining our state's water supply. The Sierra Nevada region which supplies over 60% of the state's developed water is also home to a disproportionately large number of disadvantaged communities (DACs). DWR characterizes DACs as communities whose income is at or below 80% of the state's median household income (MHI). According to 2010 Census Data, over 40% of the range's (based on Sierra Nevada Conservancy's boundary) population lives in disadvantaged communities which is concerning as compared to other regions of the state. Given the geographically dispersed nature of the range, disadvantaged communities within the Sierra lack the resources necessary to adequately quantify, monitor and protect their water resources. The Sierra Nevada region accounts for about 22% of California's land area, but less than 2% of the state's population. This makes it very difficult for Sierra IRWM projects to compete in the cost-benefit analysis with large population centers. In just costs more per person to meet the water needs of a dispersed and disadvantaged population. Thus, it is of the utmost importance to establish a threshold for the percentage of DACs relative to a planning region's total population and area when allocating funding for IRWM planning.

2. It is very difficult for IRWMPs headed by and working with nonprofit organizations to compete for smaller-scale projects focused on green infrastructure/resilience/watershed restoration projects. Many small actions to increase the resiliency of the watershed, increase water use efficiency, and re-establish vegetation would accomplish a significant benefit in terms of aquifer recharge, flood reduction, and water supply reliability and security.

In regards to Round 2 IG Funding, we ask that you take another look at the cost-benefit and technical analyses of the Sierra IRWM proposals, considering the information and handicaps above.

Looking forward to Round 3 IG funding next year, the last chance for Proposition 84 funding for IRWMPs, we ask that DWR consider one or a combination of the following proposals, or a similar mechanism to ensure that headwaters regions and rural DACs are funded:

- Create a block grant or set-aside for regions with a rural, high-DAC proportion population. “Rural” should be measured by population density of the IRWM region and the proportion of the population that is disadvantaged should be 40% or greater. Optionally, being a headwaters region could be used in addition to, or in place of either the rural or disadvantaged metric.
- Create a block grant or set-aside for headwaters regions and/or smaller green infrastructure/resilience/watershed restoration projects in the headwaters region.
- Create a block grant or set-aside for projects included in an IRWMP, but is open only to non-profits, RCDs, and other folks working on small restoration projects. It has not been well received.
- Create a process to weigh headwaters and high DAC proportion applicants differently, based on the handicaps outlined above.
- Create a process to weigh smaller green infrastructure/resilience/watershed restoration projects in the headwaters region differently, based on the handicaps outlined above.

Once again, thank you for the opportunity to comment and thank you for all of the work you do to improve water quality, supply, and management in California and especially in the Sierra Nevada Region.

Sincerely,



Joan Clayburgh  
Executive Director