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August 8, 2008

Joe Yun
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Dear Joe:

Thank you for the opportunity to share with you recently a preview version of the input document that the DAC Task Group has developed to support Proposition 84 IRWM Guidelines. The final version is included with this letter and the Group hopes that you will find it useful as you complete the Guidelines.

Even though this letter comes to you on MSWD letterhead, please accept it as being from the DAC Task Group convened by the Round Table of Regions. Task Group members include representatives from 10 or so IRWMP groups, as well as consultants and clean water/environmental justice organizations. Individual names and organization names are not included because the group does not wish to convey that these recommendations have received formal endorsement by their individual organizations. Yet the document represents considerable thought, consensus and dedication from the 20 or so members who crafted it. This group represents working planning regions, large and small and across the state. The Roundtable's members have provided comments and may individually endorse the document and submit it to you as their own.

We believe we have had a successful collaboration in preparing this document and look forward to other opportunities to work in support of IRWMP and the DWR's goals. We appreciate the Department's interest and support of the vital needs and opportunities that disadvantaged communities represent, to better the lives of all of California's citizens.

Best regards,

Marilyn

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CONSIDERATIONS FOR INCORPORATING DISADVANTAGED COMMUNITIES INTO THE DEVELOPMENT OF PROPOSITION 84 INTEGRATED REGIONAL WATER MANAGEMENT GUIDELINES

1. Allow funding for DAC projects to be phased, thereby recognizing that using a strong "readiness to proceed" standard for project selection will often preclude DAC projects, intentionally or not. (See item 6 for additional discussion).

2. In establishing governance policies, IRWM groups should be discouraged from establishing a requirement to contribute to the planning costs or "pay to play". Such approaches tend to severely limit participation and create barriers unlikely to be overcome by DACs and non-governmental organizations.

3. Minimum Requirements for IRWM plans
    a. On a pass/fail basis, the Plan must detail the IRWM group's good faith effort to engage with DACs and the results of that dialogue. If the IRWM group is unable to engage the DACs in its region or concludes no DACs exist within the region, documentation that supports that conclusion must be provided.
    b. Plan should reflect an open process, demonstrating evidence that DAC involvement in the planning process was not constrained by the inability to pay costs related to planning and participation.
    c. Plan must include a needs identification and analysis of the region's DACs for the plan to be funded. DWR should consider a DAC needs analysis as a valid activity for state funding during the planning phase.

4. Elements that Characterize High Quality Plans
    a. Intended use of these best practices is as criteria appropriate to qualify high quality plans; criteria should be applied to all aspects of the Plan, including DAC.
    b. The outreach efforts described in the Plan should be culturally appropriate and include alternative attendance modalities (location, time etc).
    c. Outreach to DACs should include both initial and ongoing efforts over life of the Plan to allow participation on an as-needed basis.
    d. A high quality Plan should demonstrate endorsement from DACs in the plan's region and describe efforts to resolve points of disagreement.
    e. A high quality Plan will include DAC projects that reflect their priorities as determined by communities themselves. Other indicators of disadvantaged status may also be used in setting priorities.
    f. The prioritization process should identify how DACs were involved in project ranking,
    g. Reaching out to all agencies and local governments within the region demonstrates true integration and allows the leveraging of resources on an inter-agency basis. DAC priorities are likely to especially benefit from such focus.

h. A high quality Plan should ensure that Technical Assistance is available for DACs through a coordinated effort that includes DWR, IRWM member agencies and local non-profit organizations.

5. Include basic human health needs as fundamental Plan goals, to the extent they relate to water management goals.

6. Catch-up Funding
   a. Catch up funding that can be used on a pre-project basis to foster DAC involvement and identify needs would be useful. Often, projects designed to meet the needs of the disadvantaged populations within a region need to be brought to the same level of readiness as other prioritized projects. Such "catch-up funding" and technical assistance can be provided by DWR or larger agencies in the region.
   b. DWR should consider providing "planning" funding to engage DAC involvement and complete a water-related needs analysis for communities in the region.
   c. DAC implementation projects should reflect the findings of the needs assessment, especially focusing on bringing the community to a baseline of services.

7. DAC projects should not be required to have match, and scoring should not give greater weight to those that have match.

8. Defining DAC
   a. Within a region, some areas have census tract data based DACs that satisfies language of the bond. These areas should be the first priority and not have them count against their match.
   b. If the census tract information does not indicate DAC status, plan proponents should consider an alternative analysis to identify DACs; such analysis might be based on other social indicators such as the Economic Hardship Index.

9. Other Observations
   a. High quality plans should look at alternative funding strategies for DAC projects, including O&M options tied to affordability.

--This document is a collaborative result of discussion among members of the Roundtable of Regions DAC Task Group. As such, it reflects consensus among Task Group members, and not an endorsement by the Roundtable of Regions.