



# Upper Mokelumne River Watershed Authority

5883 Camanche Parkway South • Valley Springs, CA 95252  
Telephone: (209) 772-8340 Fax: (209) 772-8264

November 18, 2011

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

Subject: Comments on Draft Round 2 Planning Grant PSP

Dear Mr. Frankenbach,

The purpose of this letter is to provide comments on the Department of Water Resources' draft Round 2 Planning Grant Proposal Solicitation Package (PSP). The Upper Mokelumne River Watershed Authority (UMRWA) is the approved regional water management group for the Mokelumne-Amador-Calaveras (MAC) region. The Authority is a joint powers agency established in the year 2000 for the purpose of preserving and enhancing Mokelumne River water supply, water quality, and the environment. UMRWA is a public agency representing the integrated regional water management interests of MAC region.

UMRWA, representing the MAC region, and the Northeastern San Joaquin Groundwater Banking Authority, representing the adjoining Eastern San Joaquin region, will be submitting a Round 2 inter-regional planning grant application. The joint grant application is expected to seek funding to develop the technical, environmental and institutional elements of a mutually acceptable joint inter-regional conjunctive use program which addresses multiple water resource management issues and conflicts within and between the two neighboring regions.

UMRWA is generally concerned that the Round 2 draft PSP does not adequately differentiate between inter-regional planning grant applications and applications by individual regions. Specifically, there are two areas in the PSP that we believe warrant DWR's critical review and modification; the required content of the application, and the scoring approach. We believe the draft PSP fairly addresses the needs of individual applications but may not be well suited to promote and assess inter-regional applications.

Our specific comments on the draft Round 2 PSP are attached. We hope you will agree that the application content requirements and scoring criteria for inter-regional applications should be modified to better reflect the unique planning tasks and outcomes associated with these uncommon applications.

We appreciate the opportunity to submit these comments. Please email me at [robalcott@aol.com](mailto:robalcott@aol.com) or call me at (707)785-1008 if you have any questions.

Sincerely,

Rob Alcott  
Executive Officer

#### Members

Alpine County • Alpine County Water Agency • Amador County • Amador Water Agency • Calaveras County • Calaveras County Water District • Calaveras Public Utility District • East Bay Municipal Utility District • Jackson Valley Irrigation District

**UMRWA COMMENTS: DRAFT Round 2 PROP 84 PLANNING GRANT PSP**

<b>Comment Number</b>	<b>Location</b>	<b>Discussion</b>
1	III.Funding. <i>Page 8</i>	50% of the \$9 Million in funds proposed for Round 2 will be taken from “Inter Regional” funds as authorized by Proposition 84. We request that a portion of the \$9M (\$3 Million +/-) be reserved for awards made to inter-regional applicants.
2	V. Application Instructions; B. What to Submit; 1. Application Instructions; Attachment 2, Eligible Applicant Documentation. <i>Page 14</i>	For inter-regional applications, Attachment 2 should include an entry that allows designation of the lead agency as the applicant on behalf of all participating region(s).
3	V. Application Instructions; B. What to Submit; 1. Application Instructions; Attachment 3, Work Plan. Current Status in Meeting IRWM Standards. <i>Page 15</i>	For inter-regional applications, Attachment 3 should include a means by which joint applicants can illustrate (through the Work Plan description) how a proposed grant-funded inter-regional planning activity will help improve, augment or address a deficiency as identified by the participating IRWMs. This discussion should be in lieu of requiring discussion on how the grant funded effort would help address an IRWM deficiency / address IRWM standard requirements.
4	VI. Review and Scoring Criteria, Table 4, Scoring Criteria, Program Preferences, Include Regional Projects or Programs. <i>Page 19</i>	While we support the award of points toward proposals that include regional projects or programs, modifications to the scoring system should be made to facilitate effective evaluations of proposed inter-regional projects or programs.
5	VI. Review and Scoring Criteria, Table 4, Scoring Criteria, Program Preferences, Effectively resolve significant water related conflicts within or between regions. <i>Page 19</i>	While we support the award of points toward proposals that work to resolve water related conflicts <u>within</u> regions, modifications to the scoring methodology should be made to effectively evaluate and reward grant applications with projects or programs efforts that resolve water related problems <u>between</u> regions.

Members