ATTN. J. YUN

Gonzalez, David (PDD)
From: Gonzalez, David (PDD)
Sent: Thursday, October 18, 2007 5:59 PM
To: 'jyun@water.ca.gov'
Cc: Delegal, Kathi
Subject: IRWM GRANT PROGRAM WORKSHOP COMMENTS

Attachments: IRWM Comments LADPW.doc

Mr. Yun,

The attached file contains County of Los Angeles, Department of Public Works' comments regarding the IRWM Grant Program Workshop – Propositions 84 and 1E.

If you have any questions, please do not hesitate to call me.

Thank you.

IRWM Comments LADPW.doc (58 KB..

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Propositions 84 and 1E

- Prop 84 and IE funds should remain separate. Without the final guidelines, there is no indication of how a single application will be processed for both funds. Until the State can clearly define how the merged process will work there is no way to assess potential impacts to projects.

- IRWM planning grants should be funded from the $100 million interregional funds and regional flood planning grants should be funded from the $300 million stormwater-flood management funds.

Propositions 1E, Stormwater-Flood Management

- The $30 million cap or 10% maximum per project for 1E should be reconsidered. The voters approved Prop 1E based on the text of the proposed law. Three Hundred million dollars was approved for stormwater flood management projects under Article 4, section 5096.827. The only requirement for eligible projects was that they have a non-state cost share of not less than 50 percent. Providing more restrictive funding limitations beyond those in the bond measure approved by the taxpayers would limit eligible projects.

Proposition 84 IRWM Program,

- As DWR prepares the guidelines that would ultimately be used for IRWM regions to apply for grant funds, it is critical that DWR recognizes the existing established IRWM regions in the State. This recognition should include a clear definition of what DWR considers to be a region. The absence of such recognition and definition has the potential to lead to confusion, duplicative and overlapping IRWM efforts that would result in wasted resources and time for the existing established IRWM regions and DWR.

- In the Prop 84 identified funding areas that contain multiple established IRWM regions, attempts are being made to identify a methodology to allocate the Prop 84 funds to the established IRWM regions within the funding area. However, requiring the established IRWM regions to agree on a methodology has proven to be a challenging effort that could ultimately end up with politically fraught results. Therefore, we recommend that the final IRWM program and guidelines describe a more politically neutral and equitable alternative to apportioning the Prop 84 grant funds. Our recommendation, which is based on the initial funding precedent in the Prop 84 bond language, is that each established IRWM region within a funding area receive a fixed base allocation with the variable amount based on population within the established IRWM region.

- Prop 84 requires competition in the process to select projects for grant award. With a resolution as to how to allocate Prop 84 funds within a funding area, established IRWM regions' project selection and prioritization processes would serve as the competition process meeting the intent of Prop 84. The Greater Los Angeles County region is finalizing its project selection and prioritization process that has a competition framework and more importantly, it is structured to meet the specific needs of the region. Therefore, we recommend that the Prop 84 guidelines for implementation grants include performance requirements for the development of project selection and prioritization processes in IRWM regions and that they recognize the competition inherent in those processes.

- Administering the IRWM program at the IRWM regional level is a very resource intensive and expensive endeavor. Therefore, we recommend that the IRWM program guidelines identify a process to provide Prop 84 funding to established IRWM regions to finance their annual cost of administering the IRWM program. The guidelines could establish performance benchmarks that regions must meet to receive funds for administrative expenses.

- The current implementation grant contract form contains requirements that place extraneous and burdensome liability on organizations that are acting as grant recipients for an IRWM region. We urge DWR to provide flexibility in its grant contract including allowing projects proponents to be parties to that contract.