

Fax

To: Joe Yun

Pages: 3 Including Cover Sheet

Staff Environmental Scientist

Fax: (916) 651-9292

Date: 10/19/07

Phone: (000) 000 - 0000

From: Jeff Ford

Interim Water Resources

Manager

Re: Upper Santa Clara River Region Comments on
the Integrated Regional Water Management Grant
Program Workshop

Voice: (661) 297-1600 Ext: 281

Fax: (661) 513-1202

Urgent

For Review

Please Comment

Please Reply

• **Comments:**

October 19, 2007

Mr. Joe Yun
Staff Environmental Scientist
Department of Water Resources
Conjunctive Water Management Branch
PO BOX 942836
Sacramento, CA 94236-0001

Re: Upper Santa Clara River Region Comments on the Integrated Regional Water Management Grant Program Workshop

Dear Joe:

On behalf of the Upper Santa Clara River (USCR) Integrated Regional Water Management Plan Region, I would like to thank the Department of Water Resources for conducting the recent "Focused Input Meetings" in September, and allowing the public to provide input on the concepts outlined. By way of background, the members of the USCR Regional Water Management Group (RWMG) are Los Angeles County Flood Control District, Castaic Lake Water Agency, City of Santa Clarita, Santa Clarita Valley Sanitation District, Newhall County Water District, Valencia Water Company, San Gabriel-Los Angeles Rivers and Mountains Conservancy and the Santa Clarita Water Division of Castaic Lake Water Agency.

As you move forward with development of the Integrated Regional Water Management program, the USCR RWMG would like to submit the following specific input for your consideration in the areas of: 1) regional definition, 2) IRWM plan standards, and 3) allocation of funding area funds.

Regional Definition

The USCR RWMG strongly agrees with the DWR proposal that IRWMP regions be defined based on water systems, whether they are manmade or natural.

The USCR RWMG also recommends that DWR reward and encourage, through early funding allocations, IRWMPs that cover the remaining regional gap in a funding area, through a mechanism that gives preference to IRWMPs that do not overlap and have not been previously funded through Proposition 50 or Proposition 84. Of the eleven funding areas that have been defined for Proposition 84, there are four funding areas that have IRWMPs which cover virtually the entire funding area. But of those four funding areas, there is only one funding area in which there are no overlapping boundaries among the various IRWMPs, which is the Los Angeles/Ventura funding area. Given the significant resources involved in developing IRWMPs, the extension of goodwill by funding the newer or previously unfunded (through Proposition 50) Regions, DWR would also provide an incentive to other "gap areas" across the state to continue through this sometimes daunting process.

The USCR RWMG believes one grantee should be recognized by DWR within each IRWMP's RWMG, and that grantee would have the sole authority to apply for funding on behalf of that IRWMP Region. The process that a given IRWMP takes to select the grantee should be left up to the regions to decide, however.

IRWM Plan Standards

The USCR RWMG is supportive of DWR developing IRWM Plan Standards designed to improve the quality and content of IRWMPs while still allowing access to grant funds if all the standards haven't been fully met by the time an application deadline is looming. Understanding that significant funding needs exist currently, and therefore in advance of each IRWMP being able to achieve whatever IRWM Plan Standards that will eventually be developed, the USCR RWMG is supportive of DWR defining the appropriate "quality indicator" that the IRWMP would be required to meet based on how much IRWMP funding has been received by an IRWMP. IRWMPs that have received more IRWMP funding should be subject to higher standards. The USCR RWMG would not be supportive of an ever-increasing bar between Step 1 and Step 2, and then Round 1 and Round 2, given the already demanding process involved in preparing a grant application.

In terms of an "outreach standard", the USCR RWMG supports a standard that documents that significant outreach has been performed, rather than requiring engagement by particular stakeholders. Continuing to invite and educate entities should be the goal, rather than requiring IRWMPs to meet a level of involvement. What should be avoided is the exclusion of any category of stakeholder group to the detriment of the goals of the 2005 Water Plan.

The quality indicator for the outreach standard, if one is developed, could be demonstrated through internet posting of emailed or mailed invitations, combined with stakeholder sign-in sheets that document that the meetings and updates were widely distributed.

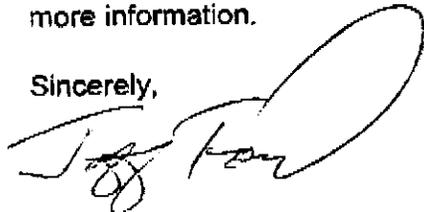
Allocation of Funding Area Funds

The USCR RWMG strongly endorses at least a \$25 million "base plus" allocation formula for determining the IRWMP allocation of funding. Whether or not the various IRWMPs in a funding area are able to come to agreement on an equitable funding allocation, we recommend that DWR ensure at least a \$25 million minimum allocation to each IRWMP within a funding area be made. What should be added to the "base plus" formula is not clear, but the USCR RWMG supports rewarding Regions with a minimum base that is significant enough to encourage continued participation.

The USCR RWMG further supports DWR defining the "competition" element required in the Proposition 84 bond language as the process that each IRWMP goes through during the project selection process. After that, the funding should be allocated based on the base plus either 1) what the various IRWMPs have agreed to, or 2) what DWR decides is equitable if no agreement can be achieved.

Again, thank you for allowing public comments on this complex process. As always, if you have any questions about our comments or our Region, please don't hesitate to call, or log onto <http://www.scrwaterplan.org/> for more information.

Sincerely,



Jeff Ford
Interim Water Resources Manager
Castaic Lake Water Agency
27234 Bouquet Canyon Road
Santa Clarita, CA 91350
Phone: (661) 513-1281
Fax: (661) 513-1202
email: jford@clwa.org