



Department of Water Resources  
Division of Integrated Regional Water Management  
PO BOX 942836  
Sacramento, CA 94236-0001  
Attention: Joe Yun  
Via email: dwr\_irwm@water.ca.gov

Re: DWR's Prop 84 IRWM Draft Grant Program Guidelines and PSPs

Dear Mr. Yun:

Amigos de los Rios appreciates the hard work of DWR staff in preparing the draft Integrated Regional Water Management (IRWM) Grant Program Guidelines and Planning Grant Proposal Solicitation Packages (PSPs). We look forward to working with the Gateway IRWM Authority in an inclusive process that will ensure the involvement of Disadvantaged Communities in the development of integrated regional plans and the implementation of regional projects. However, we are concerned about the required match for planning grants and the extensive economic analysis required for implementation grant funding.

Particularly for regional water management groups with significant proportions of DACs, the 50% match is potentially cost-prohibitive. While we recognize DWR's desire to see local commitment to the IRWM process, we believe that the significant investment in preparing applications for the Region Acceptance Process does demonstrate tremendous local involvement and commitment. Instead, we respectfully request that you consider a 25% match for planning grants, further reducing it to 10% for Regional Water Management Groups where more than 50% of the region's total population is classified as DAC. We also request that DWR allow the demonstration of matching funds to begin with the passage of Proposition 84 in November of 2006, which would follow the precedent set for the application of Prop 50 funds.

With respect to the Implementation Grants, we are also concerned about the extensive economic cost-benefit analysis required for each project. There are multiple benefits prioritized by the State in the IRWM program and not all of these are simple to quantify. In particular, the economic benefit of open space is fundamentally a subjective calculation at any level. We agree with the Gateway Authority's suggestion relative to alternative methods of calculation to determine the value and efficiency of the use of the taxpayer's dollar.

Thank you for this opportunity to submit written comments on the draft Guidelines and PSPs.

Sincerely,

A handwritten signature in black ink that reads "Claire Robinson". The signature is written in a cursive style with a long horizontal line extending from the end.

Claire Robinson  
Managing Director