



April 23, 2010

To: CA Department of Water Resources
ATT. Joe Yun, Division of Integrated Regional Water Management

From: Rick Breeze-Martin

Subj.: Comments on the draft IRWM Program Guidelines for Prop 84

Thank you for the opportunity to provide input and comment to the DWR Draft Prop 84 Program Guidelines. In general I think the guidelines are very good, there are a couple of specific clarifications to propose. My comments and recommendations by section and page number for revising the draft guidelines are listed, below.

Sec. F (pg.12) bulleted item 5 states: "Address critical water supply or water quality needs of disadvantaged communities within the region". Language elsewhere indicates a broader participation of Disadvantaged Communities in Prop 84 than merely as recipients of water supply and improved quality. I suggest that participating in Prop 84 planning and project implementation is also an important aspect of including Disadvantaged Communities. *Recommendation:* Change the wording of Sec. F (p12) bullet item to be more consistent with the broader involvement of the bullets in the final row of Table 1 - Statewide Priorities (Ensure Equitable Distribution of Benefits). The revised bullet # 5 (pg.12) should read – "Address critical water supply or water quality needs of disadvantaged communities within the region, and include Disadvantaged Communities and organizations representing these communities in the planning and implementation of Prop 84 funded projects."

Sec. C (pg 17) Eligible Project Types – Planning Grants currently does not include reference to the need for reasonably complete and current assessment of project planning watersheds. (*Region Description* pg.21 list of items is a good example of the different elements of a comprehensive assessment.) *Recommendation:* Add language that indicates the importance and need of plans being grounded in a comprehensive and integrated assessment of the project areas watersheds. Such a change in wording could be: "Eligible projects are activities that directly develop, update, or improve an IRWM plan *grounded in a comprehensive and current assessment of the plan area watersheds that address at least those items listed in Part IV sec A page 21 Region Description*). Such activities may include focused, topic-specific activities that fill gaps or improve sections of the IRWM plan, i.e. salt/nutrient management planning or enhanced integration of flood management, as well as broader plan development efforts. Applicants must establish within their grant proposals (work plan and other components) that the end result of the proposed activities is an IRWM plan that meets the new IRWM plan standards and serves to meet the regional water management objectives contained in their IRWM plan.

Sec. A IRWM Plan (pg 19) bulleted item 1, uses the Ahwahnee Water Principles as an example IRWM planning that is planning "...not focused on a single use of a resource, but seeks to manage that resource based on all the ways that the resource can be used." A very good example and I think another example would help when considering projects.

Recommendation: Add as another example to this section the "Principles of Watershed Restoration, Protection and Community Involvement" jointly developed and approved by the Rural California Resource Counties (RCRC) and Sierra Nevada Alliance (SNA).

Part IV sec's A – F identifies, among other things, IRWM Plan requirements with F ending the section with "Monitoring". *Recommendation:* Add a sec. G "Evaluations". The new sec. G wording might read: "Plans for projects funded by Prop 84 will include an evaluation that addresses formative (process) and summative (results) components of the project. The Evaluation is to be designed to provide transparency and accountability for project implementation as well as to provide lessons to improve the quality of future project planning and implementation."

Thank you for the opportunity to offer my review comments and recommendations for improving the final Prop 84 Program guidelines.