



GATEWAY CITIES

COUNCIL OF GOVERNMENTS

April 23, 2010

Artesia

Avalon

Bell

Bellflower

Bell Gardens **Mr. Joe Yun**

Department of Water Resources
Division of Integrated Regional Water Management
PO BOX 942836
Sacramento, CA 94236-0001

Commerce

Compton

Cudahy

Downey

Dear Mr. Yun:

Prop 84 IRWM Funding Guidelines

Hawaiian Gardens **The Gateway Cities Council of Governments (Gateway Cities COG) is appreciative of the hard work of DWR staff in preparing the draft Integrated Regional Water Management (IRWM) Grant Program Guidelines, Planning Grant and Implementation Grant Proposal Solicitation Packages (PSPs). As the council of elected officials from the 27 cities in the Gateway Region, we are supportive of an inclusive process that will ensure the involvement of Disadvantaged Communities (DACs) in the development of integrated regional plans and the implementation of regional projects. However, the Gateway Cities COG is concerned about the required match for planning grants and the extensive economic analysis required for implementation grant funding.**

Huntington Park

La Habra Heights

La Mirada

Lakewood

Long Beach

Lynwood

Maywood

Montebello

Norwalk

Paramount

Pico Rivera

Santa Fe Springs

Signal Hill

South Gate

Particularly for regional water management groups with significant proportions of DACs, the 50% match is burdensome and potentially cost-prohibitive. While the COG agrees with DWR that it is important to demonstrate local commitment to the IRWM process, we believe that the significant investment in preparing applications for the Region Acceptance Process does demonstrate 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 disadvantaged. 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 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 IRWM Authority's suggestion relative to alternative methods of calculation to determine the value and efficiency of the use of the taxpayer's dollar.

Vernon

Whittier

Thank you for this opportunity to submit written comments on the draft Guidelines and PSPs. We value and support DWR's commitment of staff & resources for running virtually concurrent PSPs for both Planning and Implementation Grants.

County of Los Angeles Sincerely,

Port of Long Beach

Gordon Stefenhagen

President, Board of Directors and Mayor City of Norwalk

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