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From: amyvander@gmail.com on behalf of Amy Vanderwarker

Sent: Fri 4/23/2010 4:02 PM

To: DWR IRWM Grants

Cc:

Subject: Greater Monterey County IRWMP amended letter

Attachments:

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Hello -

I just spoke with Joe Yun regarding the Greater Monterey County IRWMP comment letter on DWR IRWMP guidelines. It was agreed that the region could send in an amended letter by April 30th....we had some serious technical difficulties which prevented all the groups in the GMCIRWMP Regional Water Management Group from signing off on all the comments. The changes will be relatively minor.

The letter was sent from Susan Robinson for the Greater Monterey County IRWMP.

We sincerely appreciate your flexibility on this matter, it is extremely helpful for us.

Please do not hesitate to contact me with any additional questions,

Sincerely,

Amy Vanderwarker

Environmental Justice Coalition for Water

510-533-3312

April 29, 2010

Mr. Joe Yun
Department of Water Resources□
Division of Integrated Regional Water Management□
PO Box 942836□
Sacramento, CA 94236-0001□

Dear Mr. Yun,

On behalf of the Greater Monterey County IRWM Region, we wish to submit the following comments along with our compliments for the tremendous work that you and your staff have done in crafting the Proposition 84 and Proposition 1E IRWM Guidelines and PSPs. We would also like to express our appreciation for the ongoing dialogue that DWR has created between its staff and the IRWM Regions, and for the genuine openness you have shown in considering and responding to our comments.

The six IRWM Regions in the Central Coast Funding Area have had a number of conversations to discuss the Draft Guidelines and PSPs. Several comments were collectively agreed upon as having particular importance for all six Regions. Those comments are as follows:

1. DWR is requiring greater amounts of project information and setting higher standards through the proposed guidelines. Examples include more data management and analysis, substantial economic analysis, and more detail on who implements plans and projects. We have concerns that the level of effort associated with these and other requirements would serve to limit what could/would be put in any plan and would potentially reduce the diversity of the participants. We are concerned that this level of effort may discourage smaller organizations, such as non-profits, and smaller communities, particularly Disadvantaged Communities (DACs), from proposing projects. In addition, the higher level of analysis required of projects would tend to discourage inclusion of conceptual projects to address emerging concerns: i.e., long-term planning. This limitation would reduce the utility of the IRWMP to support other grant applications. In particular we urge DWR to reduce the level of effort necessary to prepare acceptable economic analysis in both the IRWM standards and in the application guidelines.
2. We urge DWR to provide more time between the submittal dates of the various grant applications.
3. Climate change discussion in IRWM Plans could prove to be a work intensive item. Duplication among closely spaced regions would be wasteful. We suggest strongly that DWR provide funding area-wide grants to prepare a common analysis for multi-region funding areas, such as the Central Coast.
4. We believe a 50% match for planning grants is unreasonable, particularly for areas that have received no prior grants.

The Regional Water Management Group for the Greater Monterey County IRWM Region would like to offer the following additional comments:

Draft IRWM Program Guidelines

General Comment re: “Planning” and “Research” Projects: It is not clear whether “planning” or “research” projects are eligible for funding under the Implementation Grant solicitation. DWR personnel have indicated that “some level of planning and design of a project” can be included within an implementation grant proposal. However, it is not clear to what extent planning and research projects would be acceptable as part of a larger proposal. We urge DWR to clarify the definition of an implementation project to include both planning and research grants, assuming such projects address IRWM Program criteria and further the objectives of the Region.

We are also concerned that the high level of economic feasibility requirements and other benefit analyses required as part of the Implementation Grant proposal will effectively prevent planning and research projects from scoring highly, and will therefore discourage Regions from including such projects within their proposals.

We believe it is important to fund planning and research projects particularly given the long-term framework of the IRWMP. If the IRWMP is meant to be a long-term strategic regional planning tool, then a positive outcome of this process will be the identification of project needs and the generation of project ideas to meet regional objectives. Providing funds for planning projects is the crucial first step in realizing conceptual projects into fully developed implementation projects. Likewise, research may be needed at times to help inform water resource managers about current or potential water resource management practices. Research is a critical part of integrated water resource management, and we urge DWR to support both research and planning projects in the IRWM Grant Program.

Page 34 Appendix B Definitions: “Costs that are not reimbursable with grant funding include...: b. Costs for preparing and filing a grant application belonging to another solicitation.” Are costs for preparing and filing a grant application belonging to the *current* solicitation reimbursable? Also, can you please clarify what “reimbursable” means (e.g., actual cash for funds spent, or something else)?

Page 51 Economic Feasibility: The cost-effectiveness and benefit-cost analysis requirements are quite detailed and will require considerable effort (and knowledge) on the part of project proponents. They also seem strongly biased toward evaluation of water supply projects. These requirements do not seem appropriate, for example, for educational efforts, for many watershed restoration projects, or for projects with an environmental enhancement focus, for example groundwater recharge, stopping seawater intrusion or overdraft, dealing with global warming, etc. We are concerned that this requirement will essentially preclude smaller organizations (such as watershed groups) from applying for IRWM grant funds and/or submitting smaller scale projects. It may also disadvantage certain multi-objective proposals that have benefits not easily quantifiable economically. We believe that projects of all types and sizes will be necessary to achieve our regional objectives, that the local regional evaluation and prioritization processes should take precedence in evaluating projects, and are concerned that the economic feasibility requirements will inequitably favor large-scale construction projects. Some specific comments:

1. Page 51 of the Guidelines states: “As part of the project selection process, the economic feasibility of a project must be considered.” It also provides that either cost effectiveness or benefit-cost analysis may be used and refers to DWR’s “Economic Analysis Guidebook” (EAG) as a resource. The EAG has specific criteria (pp. 12 and 13) for determining when a project should be justified depending on which method—cost effectiveness or cost-benefit analysis—is chosen. For cost effectiveness, the “plan that delivers the specified water quantities at the lowest cost would be the preferred plan.” For a cost-benefit analysis “a project is justified when estimated total benefits exceed total estimated economic costs...” Page 24 of the PSP seems to disregard these criteria and uses something much more subjective (high, medium or low level of benefits as determined by the reviewer) to score the project. The scoring criteria should reflect what the EAG uses to accept or reject a project. This creates a clear target to meet and makes for a level playing field. As it is currently written, the project proponent will complete a costly and time consuming analysis very early in the process, only to risk having the results reduced to the subjectivity of the reviewers at a much later stage (possibly years later), making the economic analysis basically useless for its intended purpose. In addition, please consider that an allowed cost effectiveness analysis may not reflect “benefits.”
2. Economic analyses are costly to prepare. We request that the economic analysis requirements be scaled to the size of the projects, and that requirements are differentiated between types of projects. For example, the cost-effectiveness method may be more appropriate for restoration projects, and the benefits analysis could be in narrative format. Also, we request that the analyses should not be required until the last part of the selection process. Such analyses were not required until Step 2 of the Prop 50 grant process, which seems more appropriate.

3. Smaller water districts, non-profits and DACs may not have the staff nor the economic resources to conduct an economic analysis for projects submitted in an IRWMP. We request that technical assistance and possibly financial assistance be made available to help smaller organizations and DACs with this task.

Page 74 Consideration of Effects of Climate Change: As noted above, the climate change discussion required in IRWM Plans could prove to be a work intensive item. We request that DWR entertain funding Planning Grants for multi-region Funding Areas, including the Central Coast Funding Area, to evaluate the adaptability to climate change of water management systems and to identify ways to address climate change impacts with the larger region. Supporting climate change assessments across several IRWM Regions will help ensure a consistent and high standard of analysis, will help avoid inefficiencies and duplication of effort, and will encourage a broader, region-wide, more coordinated approach to climate change impacts.

Pages 75-76 Climate Change Mitigation/GHG Reduction: The level of analysis required for GHG emissions will be extremely technical and financially costly. As with the economic feasibility requirements, we are concerned that this requirement will essentially preclude smaller organizations from accessing IRWM grant funds. The required level of analysis is well beyond the expertise (and budget) of most small organizations and DACs, particularly for smaller projects where the requested grant amount may be more limited. We request that these requirements be reduced for smaller projects, or that technical assistance (and possibly financial assistance) be made available to help smaller organizations and DACs with this task.

Draft Implementation Grant PSP

Page 9 Funding: DWR staff has stated that no funding for Implementation grants will come from the Interregional Funds. Is that true for the first round only, or is it true for all future solicitations?

Also, the PSP states that \$20M will be allocated to support urban and agricultural water conservation projects necessary to meet a 20% reduction in per capita water use by the year 2020. Note that the State's *20x2020 Water Conservation Plan* focuses only on urban water conservation projects. Will this special allocation of IRWM funds equally support agricultural water conservation projects (as implied)?

Page 11 Application Due Date: We suggest a minimum of 12 weeks for development of the grant application (particularly if the economic feasibility and climate change analysis requirements are not reduced).

Page 24 Scoring Criteria: It seems that an economic cost-benefit analysis is required for water supply benefits and for flood damage reduction benefits, and other types of benefit analyses (potentially but not necessarily including cost-benefit analyses) are required for other benefits, including water quality and natural resource benefits. The scoring criteria, however, seem a bit confused. In "Economic Analysis – Water Supply and Water Quality Benefits," scoring is based partly on economic analysis for water quality benefits, but an economic analysis for water quality benefits isn't actually required. The "Water Supply and Other Expected Benefits" box immediately below seems to essentially repeat the "Economic Analysis – Water Supply and Water Quality Benefits" item. This is unclear.

Also, the scoring for water supply and flood reduction (assuming water quality was not meant to be included in that box) seems much too high – a possible 20 points – compared with "all other benefits," which all together can earn a maximum of 5 points (this presumably includes water quality, ecosystem restoration and protection, recreation and public access, etc.). We believe the scoring in this category gives much too much preference for water supply benefits. This is not the intent of the Prop 84 legislation, which emphasizes the integration of water resource management, including water supply, water quality, flood management, and natural resource restoration/protection.

Finally, there is no mention in the scoring criteria of natural resource enhancement or ecosystem restoration. These seem to be important aspects of Prop 84 and of the IRWM program, and we believe they should be given

significantly greater weighting in the scoring of proposals. There is also no mention of public recreation; we request that public recreation be given some consideration in the overall consideration of projects as well.

Draft Planning Grant PSP

Page 8 Funding Match: We believe the 50% funding match requirement is too high. We would like to encourage DWR to make the Planning Grant process as efficient and low impact as possible, especially considering that most agencies and nonprofits in California are currently working with reduced staff, reduced budget, and even reduced number of days in the workweek. Matching funds are simply more difficult for agencies and organizations to muster these days, and requiring such a high funding match may discourage (or prohibit) Regions from developing or improving their IRWM Plans – which are the cornerstone of the IRWM process. Given that a funding match is not required by statute for Planning Grants, we urge DWR to consider lowering the match requirement to 10%, or a maximum of 25%, for Planning Grants, and for Regions that are composed primarily of DACs (if any), eliminating the funding match requirement altogether.

In addition, if a funding match is required, are consultant fees incurred after 9/30/08 and used for initial Plan development eligible for matching funds toward continued development and improvement of that Plan?

Page 9 Application Due Date: We suggest a minimum of 10 weeks for development of the grant application.

Page 17 AB 1420 and Water Meter Implementation Compliance: Given that this is a Planning Grant that focuses on development/revision of an IRWM Plan and not an Implementation Grant that focuses on implementing projects, the urban water supplier compliance requirements do not seem appropriate.

Thank you for considering our comments, and for your continued efforts in providing support for integrated regional water management planning in California.

Sincerely,

The Regional Water Management Group for the Greater Monterey County IRWM Region:

| | |
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| Big Sur Land Trust | Garrapata Creek Watershed Council |
| California Coastal Commission | Marina Coast Water District |
| California State University Monterey Bay | Monterey Bay National Marine Sanctuary |
| California Water Service Company | Monterey County Agricultural Commissioner's Office |
| Castroville Community Services District | Monterey County Water Resources Agency |
| City of Salinas | Monterey Regional Water Pollution Control Agency |
| Coastlands Mutual Water Company | Moss Landing Marine Laboratories |
| Elkhorn Slough National Estuarine Research Reserve | Resource Conservation District of Monterey County |
| Environmental Justice Coalition for Water | San Jerardo Cooperative, Inc. |