

Kennedy/Jenks Consultants
Engineers & Scientists

2775 North Ventura Road, Suite 100
Oxnard, California 93036
805-973-5700
FAX: 805-973-1440

22 April 2010

Joe Yun
Chief, IRWM Planning Grant Section
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Subject: Comments on Draft Guidelines and Proposal Solicitation Packages for Proposition
84 IRWM Grant Program

Dear Mr. Yun:

Thank you for the opportunity to comment on the Draft Guidelines and Proposal Solicitation Packages for the Proposition 84 IRWM Grant Program. Since the inception of the Integrated Water Resources Management Program (IRWMP), Kennedy/Jenks has assisted four separate entities with the preparation of IRWMP grant applications. In addition, Kennedy/Jenks has, or is currently assisting, five entities with management of their Proposition 50 IRWM grants. Based on this experience we respectfully offer the following comments:

1. The Guidelines and the PSP differ slightly in their discussion on compliance with AB 1420. The PSP states that it is necessary for a grant recipient to be in compliance with AB 1420, this differs from the Guidelines which include a provision that allows agencies to apply for funding to enable compliance with AB 1420.
2. The Guidelines and PSPs specify that funding match must be from non-state sources. This would exclude participation of state agencies such as Resource Conservation Districts or the California Department of Public Health, agencies which commonly participate in IRWMPs. However, the Guidelines encourage the participation of state agencies. The PSPs should be revised to clarify how state agencies can participate in IRWM grants.
3. Some of the technical analyses required by a IRWM Implementation Grant application will require an agency to hire a consultant. Developing a scope and having a consultant selected by the agency's governing body will require a minimum of 6-8 weeks time. Based on our most recent experience with Proposition 50 Step 2, it takes between 1000 and 1600 person-hours to prepare an implementation grant application (this is just

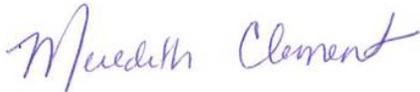
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consultant time, not project proponent time). This means it will take a team of four persons approximately 9-14 weeks to prepare a grant application. In order to allow an entity to hire a consultant and then prepare an application, the IRWM Implementation Grant application time period should be a minimum of 14 weeks.

4. Presumably similar project proponent staff will be utilized for both a planning grant and implementation grant, for this reason the preparation period of the planning grant and the implementation grant should not overlap.

Very truly yours,

KENNEDY/JENKS CONSULTANTS



Meredith Clement
Water Resources Planner