



NORTH COAST INTEGRATED REGIONAL WATER MANAGEMENT PLAN

April 23, 2010

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

Re: Draft Proposition 84 and 1E IRWMP Program Guidelines and Proposal Solicitation Packages
Public Comment

Dear Mr. Yun,

The North Coast IRWMP (NCIRWMP) Policy Review Panel (PRP) appreciates the Department of Water Resource's thorough and thoughtful development of the Draft Proposition 84 and Proposition 1E IRWMP Program Guidelines (Guidelines) and Proposal Solicitation Package (PSP). The NCIRWMP Policy Review Panel supports DWR's continued emphasis on multi-objective planning and addressing multiple water management strategies, as well as the focus on enhancing capacity in disadvantaged communities. Following are our comments.

The NCIRWMP is anticipating a funding need of well over \$300 million for the region, and the expected allocation of \$37 million via Proposition 84, combined with the opportunity to apply for Proposition 1E funds, represents a significant opportunity for the North Coast region to address long term challenges associated with myriad water supply and water quality issues. It should be noted that small and reduced maximum funding amounts undercut the effectiveness of the regional program and promotes intra-regional divisiveness instead of cooperation. In addition, funding reductions create barriers to a project's success: some projects are not scalable and funding reductions make the project infeasible; funding reductions may impede a project's ability to achieve the stated benefits; and the reduced scope and scale may cause the project to no longer be viable.

Funding Allocations - Timing

The NCIRWMP PRP requests that DWR consider modifying its process for distribution of regional Proposition 84 allocations for Funding Areas that contain one IRWM Planning Region to allow for more flexibility and local control over the timing of these allocations. We request that regions that have demonstrated their commitment to regional planning and are defined by one Funding Area be allowed to work with DWR to establish a schedule which ensures that all stakeholders and interested project proponents have the opportunity to apply for funding, and ensures that good planning and outreach can take place in advance of the application process. The NCIRWMP believes that timing is critical for ensuring that the limited resources in this predominantly economically disadvantaged region can be used effectively for planning and implementation, rather than multiple rounds of applications – which require substantial staffing resources and may act as a deterrent to the participation or success of the region’s disadvantaged communities (DAC).

- **The NCIRWMP recommends that Funding Areas that are made up of one Region work with DWR to develop a process and schedule for allocation distribution that results in effective planning, efficient proposal development, DAC engagement, and a larger number of high quality projects funded.**

Eligibility, Maximum Funding Amounts, Funding Match & Schedule

The process and schedule as outlined in the Guidelines and Prop 84 and 1E Implementation PSPs regarding the eligibility of projects in IRWM Plans that were adopted “prior to Sept. 30, 2008” is problematic and would not acknowledge the outreach and new projects that have been identified through IRWM Planning efforts that have occurred since that time. As currently proposed, by including new projects utilizing the governance, technical review and open and transparent processes for vetting projects as outlined in our approved Regional Acceptance Process, the North Coast region would be required to quickly update the NCIRWMP to comply with all of the new IRWM Plan Standards to be eligible for the first round of Prop 84 Implementation funding. On page 15 in the Guidelines, the Eligibility Requirements state that

“When submitting for a grant, applicants will need to demonstrate the projects in a proposal are included in their IRWM plans or have been added to the implementation project list for an IRWM plan according to the procedures in that plan. If an IRWM plan is silent on procedures to update the implementation project list, the applicant is limited to projects contained in the plan at the time of adoption.”

In 2009, NCIRWMP along with other regions participated in the Regional Acceptance Process where regional plans and their processes were vetted by DWR for acceptance and approval as a condition to subsequent submittal for IRWM grant funds.

- **The NCIRWMP recommends that the eligibility requirement be amended to allow the 2009/2010 RAP approval of a Region to be the eligibility standard for the first round of Prop 84 and 1E funding. By extension, the project inclusion processes included in the**

approved plan and outlined in the RAP materials will be accepted processes for the first round of funding.

- **The NCIRWMP recommends the removal of the requirement that a re-adopted plan meet all of the new IRWM Plan Standards as a requirement for the first round of Prop 84 or 1E funding. This should be allowed for all regions approved through DWR's Regional Acceptance Process.**

The North Coast region is predominately made up of rural and economically disadvantaged communities. A large expenditure of resources will be required to ensure that these communities can participate in upcoming Prop 84 and 1E funding opportunities, including an extensive outreach effort, technical assistance program and review process.

The NCIRWMP recommends changes to the proposed schedule that include:

- **Final Guidelines and PSPs are finalized and posted in the summer of 2010.**
- **Planning Grant Round 1 application period begins in summer 2010. To allow for stakeholder, technical review and PRP discussion and approval, applicants are allowed 10 weeks to prepare and submit proposals to DWR.**
- **Prop 84 Implementation Round 1 application period begins fall 2010. To allow for outreach, technical assistance and review and PRP discussion and approval, applicants are allowed 12 weeks to prepare and submit proposals to DWR. The application period ends before the winter holiday season.**
- **Storm Water Flood Management Grant Round 1 application period begins early 2011 to allow for outreach, technical assistance, review and PRP discussion/approval, applicants are allowed 12 weeks to prepare and submit proposals to DWR.**

A 50% funding match requirement for IRWM Planning Grants is an onerous burden especially for economically disadvantaged regions.

- **The NCIRWMP recommends that the funding match requirement of 50% for the IRWM Planning Grant be reduced to 25%.**

Statewide Priorities

The NCIRWMP suggests that DWR consider enhancing the number and type of options for addressing climate change mitigation and adaptation beyond those so strictly limited to water conservation/water related energy efficiency (mitigation) and modification of coastal water infrastructure (adaptation) related to human communities, and give preference to those plans which integrate water-related climate change mitigation and adaptation in a comprehensive and integrated fashion that includes human communities and ecosystems and that address state policies such as the California Climate Adaptation Strategy, AB 32, and SB 375. Note that this is consistent with the objective to integrate land use and water management under the

Plan Standards section (e.g. sustainable forestry management benefits water supply reliability, fisheries, SWFM objectives, carbon sequestration, emissions reduction via avoidance of catastrophic wildfire, DAC viability, etc).

The NCIRWMP recommends adding the following to the Climate Change Response Actions:

- **Proposals that address adaptation – both in ecosystems and built communities. Source: CA Adaptation Strategy**
- **Proposals that increase carbon sequestration as a mechanism for climate mitigation including preservation/restoration of riparian and upland forests. Source: Managing an Uncertain Future**
- **Proposals that incorporate corridor connectivity and restoration of native aquatic and terrestrial habitats to support increased biodiversity and resilience for adapting to changing climate – Source: Managing an Uncertain Future, CA Adaptation Strategy**
- **Proposals that include flood management systems that seek to reestablish natural hydrologic connectivity between rivers and their historic floodplains – Source: Managing an Uncertain Future**
- **Proposals that include opportunities to introduce or reintroduce anadromous fish to upper watersheds – Source: Managing an Uncertain Future**

IRWM Plan Standards

The NCIRWMP recommends making the following changes to the Project Review Process section (page 22).

- **Please consider adding a bullet “Contribution of the project to contributing to carbon sequestration.”**
- **Add reference to the promotion and enhancement of carbon sequestration via habitat protection, enhancement and creation and reference the existing CAR forestry protocols as a quantification method for assessing GHG emissions reductions**
- **Add reference to corridor connectivity and restoration of native aquatic and terrestrial habitats to support increased biodiversity and climate change adaptation**

The NCIRWMP recommends making the following changes to the Plan Performance and Monitoring section (pages 57-59).

- **Consider adding a reporting and adaptive management component.**
- **Plan Performance and Monitoring is critical to regional adaptive management of an IRWM Plan. The NCIRWMP recommends that DWR considers allowing Plan Performance and Monitoring activities be funded through implementation grant funding or a**

percentage cut of the regional project implementation funding budget above the 5% administrative funding, as an eligible project management activity.

Since its inception, the NCIRWMP has provided a framework for equitable distribution of funding opportunities and inclusive stakeholder involvement in the regional planning process and project implementation. Throughout the North Coast, in spite of severe economic challenges in a predominantly disadvantaged region, communities are working to solve both current and future water supply reliability, water quality and endangered species recovery issues. Key to the success of these activities is integrated planning, the promotion of intra-regional cooperation and the maintenance of a regional process that is inclusive, flexible and equitable.

We appreciate this opportunity to provide comments and would be happy to discuss any of these suggested revisions further. Please feel free to contact myself at 707.476.2391 or Lisa Renton, of the Sonoma County Water Agency and staff to the NCIRWMP, at 707.521.6206.

Sincerely,

Jimmy Smith, Chair
North Coast IRWMP Policy Review Panel
Humboldt County Board of Supervisors

North Coast IRWM Guidelines Public Meeting Questions and Comments

- When does DWR expect to expend all of the Prop 84 regional funding? Inter-regional funding? *There is no time limit on when these funds have to be expended.*
- When does DWR expect to expend all of the Prop 1E funding?
- Once a region enters into a contract with DWR, what is the anticipated duration of the contract? Is there an expected contract end date? *There is no time limit and DWR would expect the region to tell them when the projects would be complete.*
- Is there a project funding maximum for implementation projects? *No*
- Is there a limit to regional administrative funding? *DWR will attempt to clarify project management vs. admin.*
- Would DWR consider additional criteria for inclusion in the Statewide Priorities?
Yes
- For funding areas that contain one IRWMP region, how will application scores be used to determine funding decisions by DWR? *DWR may develop language on minimum criteria that must be met*
- Can IRWMP funding be used for monitoring activities and at what percent of the total project budget? *startup monitoring – yes; operations monitoring – no; there will be more information forthcoming regarding Performance Monitoring*
- *There was a comment suggesting that DWR consider having the competition for planning grant funding happen regionally and not statewide.*
- *There were comments stating that the Planning Grant match should be reduced to 25% and a 50% match would pose a great hardship on DAC regions*
- *There was a comment suggesting that DWR consider providing a preference for regional proposals on the SWFM grant program.*
- *There was a comment suggesting that funding areas that were the same as regions should not have to participate in the competitive implementation funding rounds for Prop 84 allocations; these regions/funding areas should be able to work with DWR directly to receive funding allocations; these unified regions/funding areas should be rewarded for their extra work regionalizing*