

## **Comments on Draft Integrated Regional Water Management Grant Program Guidelines Dated March 2010**

April 23, 2010

On behalf of the Orange County Water District (OCWD), I am pleased to provide our comments on the draft guidelines for the Integrated Regional Water Management (IRWM) Grant Program funded by Proposition 84 and Proposition 1E, dated March 2010.

Stakeholders within designated regions are working together to prepare IRWMPs and to cooperate in developing a process to recommend projects considered priorities for individual regions.

OCWD is actively participating in the IRWMP process coordinated by the Santa Ana Watershed Project Authority (SAWPA). As part of this process, stakeholders are developing a system to prioritize projects for funding based on criteria that reflect state and regional priorities.

The Santa Ana Region's IRWMP will include a comprehensive project ranking system that considers state as well as regional priorities. In submitting grant applications, the Proposal Solicitation Package (PSP) requires preparation of extensive material and analysis. Moreover, within these materials incredibly detailed economic analyses would be required for each potential project. The extensive economic analyses required in Attachments 6-10 are unduly burdensome.

OCWD believes that the burdensome nature of the request has the potential to discourage the submission of otherwise deserving projects. OCWD does not dispute the need for this information as part of the evaluation process, however we recommend that the information required in Attachments 6-10 be provided in a second step after projects have been prioritized by their respective regions.

Such an approach would provide for more effective use of available resources and provide sufficient information to evaluate projects. The burdensome nature of the information that would need to be provided may particularly be an issue for disadvantaged communities and areas with limited resources.