

April 23, 2010

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

Subject: Draft Integrated Regional Water Management Grant Program Guidelines and Proposal Solicitation Packages

Dear Mr. Yun:

Thank you for the opportunity to provide comments on the draft Integrated Regional Water Management (IRWM) Guidelines and Proposal Solicitation Packages (PSP). The Department of Water Resources (DWR) was careful and thoughtful in their development of these documents. The Pajaro River Watershed IRWM Region and the other IRWM regions on the Central Coast worked together to share comments on the documents. Some of our common comments on the Central Coast include:

- Concern that the level of effort associated with higher IRWM Plan standards would serve to limit what would be included in any plan and would potentially reduce the diversity of the participants.
- Concern with the standards for the relation to local land use planning.
- In interest in a longer proposal development period for planning and implementation grant applications.
- An interest in clarification on whether proposals to conduct the technical analyses required for including projects in an IRMW Plan can be considered eligible for planning and/or implementation grants.
- An interest in Department of Water Resources (DWR) facilitation of a multi-region approach to climate change analysis.

The Pajaro River Watershed would like to highlight some of these comments and provide additional comments on the draft Guidelines and PSPs.

### **Draft Program Guidelines**

The draft Guidelines, and particularly the IRWM Plan standards, convey higher expectations as compared with Proposition 50 IRWM Program Guidelines. Meeting the standards will require significant revision to portions of the existing IRWM Plan and adjustment to existing implementation processes. We have concerns that the level of effort associated with the requirements would serve to limit the projects and participants in the planning process.

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One specific area of concern is the level of effort necessary for economic analysis at the planning level. We encourage DWR to consider reducing the required level of effort.

Another concern are the requirements in the "Relation to Local Land Use Planning" standard. The requirement to demonstrate reciprocal communication and coordination between water management organizations and planning organizations could be onerous, especially in planning regions with a large number of planning entities. The prior section "Relation to Local Water Planning" adequately addresses the need to incorporate local planning efforts into an IRWM Plan. We recommend that the "Relation to Local Land Use Planning" be revised so that IRWM Plan developers consider whether reciprocal communication is feasible and what actions could be taken to encourage reciprocal communication. We agree that, at a minimum, all local land use planning organizations should be informed of the development and adoption of an IRWM Plan and invited to give input and that an effort to communicate to planning agencies should be documented.

### **Comments on Draft Planning Grant Guidelines**

We encourage DWR to reconsider a 25 percent funding match and a match waiver for Disadvantaged Communities. Local agencies and stakeholders are experiencing difficult budgetary conditions and the proposed cost share would make it difficult to adequately update the various sections of the IRWM Plan to meet the new plan standards.

We suggest a minimum of 10 weeks for development of the planning grant application. This will provide sufficient time to engage stakeholders and complete necessary administrative procedures, such as Board or Council approval and developing cost-share agreements, associated with submitting a grant application.

### **Comment on Draft Implementation Grant Program Guidelines**

We suggest a minimum of 13 weeks for development of implementation grant applications. As with planning grants, time is needed to engage stakeholders and complete necessary administrative procedures. In addition, the level of analysis required by DWR for the implementation grants warrants a longer application period.

Again, thank for the opportunity to provide comments on the draft Guidelines and PSPs. We look forward to continuing our work with DWR and other Central Coast IRWM regions.

Sincerely,

Tracy Hemmeter  
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