

April 23, 2010

DWR
Division of Integrated Regional Water Management
PO BOX 942836
Sacramento, CA 94236-0001
Attention: Joe Yun

Subject: San Luis Obispo County Comments on Draft Proposition 84 Integrated Regional Water Management Program and Proposal Solicitation Package Guidelines

Dear Mr. Yun:

Thank you for the opportunity to comment on the draft Proposition 84 Integrated Regional Water Management (IRWM) Program and Proposal Solicitation Package Guidelines. It is clear that the Department has taken great care to address the issues and lessons learned associated with the Proposition 50 IRWM Program in this new set of guidelines.

The San Luis Obispo County Region recently coordinated with the other regions in the Central Coast Funding Area on common points for DWR's consideration. These include:

- Lengthening of proposal development period for planning and implementation grant applications.
- Clarifying 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. Guidelines indicate that technical analyses are required to support the water management needs included in the IRWM Plan, so it would seem that proposals to conduct the technical analyses are eligible for planning grants, since they are required for the IRWM Plan and would result in an updated and improved IRMW Plan.
- Facilitation of a multi-region approach to climate change analysis, ideally with the use of interregional funds, as the analyses would support the California Water Plan and state-wide priorities.
- Clarification on whether State-mandated projects are eligible (e.g., by SWRCB, Superior Court, or other judicial or quasi-judicial entity). For example, DAC projects to address critical water quality issues may be as a result of RWQCB order or mandate. Also, while the project itself might address a mandate, it may be that the components of the project proposed for grant funding are included to improve project integration and benefits, and not to address the mandate.
- Concern that the level of effort associated with higher IRWMP standards such as for data management and analysis, economic analysis and implementation, would serve to limit what could/would be put in any plan and would potentially reduce the diversity of the participants. In particular, the higher level on analysis required of projects would tend to discourage inclusion of conceptual projects to

address emerging concerns: i.e. long term planning – which is also a component of the standards (20-year minimum). This limitation would reduce the utility of the IRWMP to support other grant applications.

Please also consider maintaining the concurrent proposal development schedule, as both, or one or the other, are important to all. If DWR does consider changing the schedule, please proceed with the implementation grant first as there are very serious water supply and quality issues to address as soon as possible.

Detailed comments on the guidelines follow.

IRWM Program Guidelines

Page 16, UWMP and AB 1420 Compliance: Please clarify in the latter that “Applicants and project proponents that are urban water suppliers and have projects that would receive funding through the IRWM grant program” if that is the case; “applicants or project proponents” is a little less clear. In other words, are applicants that are urban water suppliers but passing along grant funds for project proponents’ projects without retaining an administrative portion of the grant subject to UWMP and AB1420 compliance?

Page 29, Reimbursable Costs: Please consider allowing work completed prior to the grant award as local cost match. A lot of work needs to be completed to get the projects to a point where they are competitive for funding.

Page 58, Monitoring: Project-specific measuring and monitoring plans should be reserved as a requirement for award of grant funding, with compliance with PRC §75026.(a) limited to monitoring the implementation of projects identified in the Plan and measuring the number implemented to document progress toward meeting Plan objectives.

Implementation Grant Guidelines

The last paragraph on page 6 references criteria “i” above but the two eligibility criteria are not labeled i and ii.

Page 9, first paragraph – If the governing document (i.e. MOU) for the Regional Water Management Group speaks to the addition of projects without requiring re-adoption of the Plan, does that scenario apply in context of this paragraph?

Page 9, last paragraph and sentence: What if SBx7-8 funds become available?

Page 11: Please consider hardcopies being postmarked by the due date in lieu of receipt.

Page 13, Budget: This section seems more detailed than it needs to be, considering the detail required for Attachment 4. Can this section simply ask the applicant to provide the dollar amount in selected lines (i.e. a, b, c, etc.) from the Attachment 4 Tables?

Page 15: Q16 should reference Q15, not Q11.

Page 15&17, Attachment 2: Those that meet the September 30, 2008 adopted plan criteria will not have an Attachment 2, correct?

Page 18, Attachment 3, 2nd paragraph, and Scoring Criteria: What is meant by “ready for implementation” – please consider expanding on that or providing examples. Similarly, what will be looked for to determine that it is “clear that the project can be implemented”?

Page 18, Attachment 3: “...will include points for applications where the Work Plan includes Data Management and Monitoring Deliverables that are consistent with the IRWM Plan Standards and Guidance - Data Management Standard . . .” Is there a way to provide examples of what this means? Is it applicable for all types of projects?

Page 19, Attachment 6: Please consider removing Attachment 6. It is not meaningful for determining the project’s value; it is a requirement for grant funding and should be developed upon selection for the grant agreement. Attachments 7 – 10, with simplification, better assist the Department in judging the project’s value. If it is included, and monitoring, assessment and performance measures are required specifically for the grant funded portion of the project, please indicate so.

Page 22, Scoring Criteria: Thank you for including Funding Area Balance Points.

Page 27, Tasks: Applicants are being asked to submit the tasks in detail for direct use in the scope of work section of a grant agreement before even being selected for funding. Please consider limiting the detail (perhaps by re-evaluating what back-up information [i.e. standards, computational methods, building materials analysis] is really necessary) for this and the other attachments to the minimum you need to judge between the projects. Also, since they are required for the grant agreement, wait until selection to have the applicant submit detailed performance measures and monitoring plans. The performance measures and monitoring plan doesn’t factor into the value of the project itself. This also applies to the inclusion of the details of developing a groundwater management plan. Developing a scope of work for a groundwater management plan is a significant effort that should only be triggered after selection. Lastly, if greater emphasis will be placed on evaluating the details of the grant-funded portion of the project, please include specific standards.

Page 29, 3rd arrow: Do you mean eligible costs for grant reimbursement?

Page 32 – Recommend titling the column “Non-State Share (Funding Match) and Other State Funds”

Exhibits C, D and E: The economic analysis does not seem to add value to the evaluation process. Applicants should simply describe the benefits of the project, why other alternatives were not selected, and what conditions/scenarios might reasonably occur in the future if the project is not implemented.

Planning Grant Guidelines

Page 10: Please consider hardcopies being postmarked by the due date in lieu of receipt.

Page 11, Budget: This section seems more detailed than it needs to be, considering the detail required for Attachment 4. Can this section simply ask the applicant to provide the dollar amount in selected lines (i.e. a, b, c, etc.) from the Attachment 4 Tables?

Page 17, last paragraph: It appears that regions that have included many of the IRWM Program Preferences in their IRWM Plan face an unfair handicap compared with regions that did not adequately address these with plans developed under Prop. 50 IRWM Guidelines. Also, the draft Grant Program Guidelines include eight Program Preferences, but the scoring criteria for Planning Grants allow one point for each Program Preference up to a maximum of 10 points. Are some Program Preferences weighted more than others? Will including how program preferences are already addressed in the IRWM Plan in the background section of the proposal count?

Page 18, Work Plan: As the current language implies, please consider limiting evaluation of the background description component to what is needed to demonstrate what standards are adequately addressed and what needs to be improved or added as included in the work plan to update the IRWM Plan, and focus on the detail associated with the work efforts proposed.

Thank you very much for the opportunity to comment.

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