



April 23, 2010

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

RE: Proposition 84 IRWM and Proposition 1E Stormwater-Flood Management Draft Guidelines

Dear Mr. Yun,

On behalf of the TreePeople, I am writing to provide input to the Draft Proposition 84 Integrated Regional Water Management (IRWM) and the Proposition 1E Stormwater-Flood Management grant guidelines and PSPs. TreePeople has been involved as a steering committee member in the Upper Los Angeles Sub region of the Greater Los Angeles IRWM Plan, and we support the comments submitted by the Greater LA IRWMP. In addition to the Greater LA IRWMP comments, we would like to provide some additional input that is unique to our organization and perspective.

TreePeople commends DWR for the inclusion of stormwater planning, management, and projects throughout the Guidelines and PSPs. Stormwater management through natural and green infrastructure is at the heart of TreePeople's mission and we continue to work with partners in the Greater LA County IRWMP to plan for, manage, and develop stormwater projects using these approaches.

Similarly, we appreciate the inclusion of requirements for the IRWM groups to engage and work with land use planners. As stated in the Guidelines, these issues go hand in hand and must be dealt with in a collaborative manner and not at cross purposes.

We were also pleased with DWR's approach to the climate change requirements. As an organization that is focused on helping urban communities become more sustainable, we are very engaged in the issue of climate change and addressing its impacts to the LA area as well as throughout the state. Many environmental solutions, including urban forests and green infrastructure can assist us in mitigating

and adapting to the impacts of climate change. We feel it is imperative that IRWM plans and projects consider and address the effects of climate change.

In the spirit of providing input to improve the guidelines and process, we offer the following comments:

1. Lengthen Application Timeline – Applicants will need additional time to prepare applications that meet all the additional requirements, including the economic analysis, which is anticipated to be a time consuming process requiring outside consultants
2. Score Applications Based on Merit – It appears that the scoring in each of the three PSPs is weighed heavily on process and meeting certain administrative requirements and less on the merit and/or benefits of the plan or projects. We believe the state should be investing precious public funds in the plans and projects that will lead to the greatest benefits, and not prioritizing applications that are well put together with little regard to their merit
3. Reduce IRWM Planning Match – The IRWM program is designed to provide incentives that encourage groups to work together on a regional scale to plan for and manage water resources in a collaborative manner. Should a 50% match be required to participate in the initial planning effort, which can be expensive and time consuming, this would likely discourage some regions from participating, thereby not meeting the goals of the program.

Thank you for the opportunity to comment of the Draft IRWM and Stormwater Flood Guidelines and PSPs. We look forward to continuing our work with DWR and the Greater LA IRWMP group as this process proceeds.

Sincerely,



Rebecca Drayse  
Director, Natural Urban Systems Group