



TULARE BASIN WILDLIFE PARTNERS
Creating Opportunities for Nature and People

April 23, 2010

Joe Yun
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, CA 94236-0001

RE: Comments on the Proposition 84 Integrated Regional Water Management Program and the Storm Water Flood Management Grant Program Draft Guidelines and Proposal Solicitation Packages

Dear Mr. Yun,

On behalf of the Tulare Basin Wildlife Partners, we would like to submit the following comments regarding the draft guidelines for the Proposition 84 Integrated Regional Water Management (IRWM) program and the Proposition 1E Storm Water Flood Management grant program. We would also like to thank the Department of Water Resources (DWR) for including the public in the process for the development of these programs.

Comments on the draft Guidelines for IRWM and Storm Water Flood Management:

Pg. 29: Reimbursable Costs

Previous indications from DWR were that costs incurred from the date of the appropriation of funds in SBX2_1 would be eligible for reimbursement. Until the bond freeze in December 2008, it was understood that funds appropriated in SBX2_1 would be expedited. Many IRWM groups moved forward with planning and implementation projects based on expectations set by SBX2_1 and DWR. We request that you consider reimbursements for eligible projects beginning September 30, 2008, the date SBX2_1 was signed into law.

Comments on IRWM Planning Grants PSP:

Statewide Competition for Planning Grants

We are concerned with the statement that the competition for planning grants will be on a state-wide basis. This seems to put rural areas with lesser resources available at a

disadvantage. We understand that half the money is coming out of the interregional funds, but it seems that statewide competition could result in having most of the grants go to more developed areas, leaving the regional funds in rural funding areas stranded.

Pg. 8, IRWM Planning Grant PSP:

A. Maximum Grant Amount

PSP language states: “Grants will be limited to a maximum grant of \$1 million per region.” Please clarify that this is per regional water management group.

B. Funding Match

The 50% match requirement for IRWM Planning grants is very high. This match will be especially problematic for rural areas. The Proposition 50 match requirement for planning grants was 25%; therefore, we request that the match for Planning Grants be reduced to 25% or less.

Comments on IRWM Implementation Grants PSP:

Economic Analysis

The economic analysis criteria in the PSP is weighted too heavily. Scoring for economic analysis was 10/75 points under Proposition 50 guidelines and the draft Prop 84 guidelines boost the criteria to 20/60. This criterion essentially eliminates all proposals that don't score tops in economic analyses.

In addition, some of the technical requirements like the economic analysis may be especially difficult for Disadvantaged Communities (DACs) to meet due to costs associated with them. Preparation of economic or cost benefit analyses often requires hiring outside consultants. Will DWR provide funding to help DAC projects to meet some of these application requirements?

Timeline for the Grant Application Process

The timeline for application preparation is relatively short (6-8 weeks). We understand that DWR's intent is to get this round of IRWM funding out relatively quickly; however, 6-8 weeks is not adequate to get a full proposal completed. We suggest either an extended time-frame for application preparation (10-12 weeks).

Thank you for this opportunity to comment on the Draft guidelines and PSPs for the Integrated Regional Water Management program and the Storm water Flood Management program. We look forward to working with you on these programs.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert B. Hansen". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Robert B. Hansen
President

cc: Mr. Mark Cowin, DWR
Ms. Tracie Billington, DWR
Ms. Leslie-Friedman Johnson, Conservation Strategy Group

***Contact: Carole K. Combs, Secretary of the Board, Tulare Basin Wildlife Partners, P.O. Box 1180, Three Rivers, CA 93271, phone 559/799-7204, fax 559/561-1921, ccombs@thegrid.net.
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