

Castaic Lake Water Agency  
City of Santa Clarita  
Los Angeles County Department of Public Works  
Santa Clarita Valley Sanitation District  
Newhall County Water District  
Valencia Water Company  
Castaic Lake Water Agency, Santa Clarita Water Division  
San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy (ex-officio)

April 22, 2010

Also emailed to: [dwr\\_irwm@water.ca.gov](mailto:dwr_irwm@water.ca.gov)

Mr. Joe Yun  
California Department of Water Resources  
Division of Integrated Regional Water Management  
P.O. Box 942836,  
Sacramento CA 94236-0001

RE: Upper Santa Clara River Integrated Regional Water Management Plan  
Comments on the Draft Integrated Regional Water Management Guidelines and  
Proposal Solicitation Packages

Dear Mr. Yun:

On behalf of the Upper Santa Clara River Integrated Regional Water Management Plan, Regional Water Management Group, I would like to submit these comments with regard to the Draft Integrated Regional Water Management Guidelines (Guidelines) and Proposal Solicitation Packages (PSPs). We appreciate the effort that DWR has undertaken in the preparation of the Guidelines and PSPs. We are attaching redline/strikeout versions of the documents with more detail than we've covered below, but the following are the highlights of the areas we've commented on in the attached documents.

1. The overall schedule is extremely aggressive and has significant overlaps in the efforts required. We would recommend staggering and lengthening the Implementation and Planning Grant application periods to not less than four months for Implementation grants and not less than ten weeks for Planning Grants. No part of the application efforts should overlap. The Implementation Round should come first on the schedule and Regions should be notified whether or not they were successful in the Implementation Round prior to the start of the Planning Grant application period.
2. The Planning Grant match requirement of fifty percent should be lowered to 25% for Regions with greater than 500,000 people and to zero for Regions with fewer than 500,000 people. This would help to facilitate both the preparation of IRWM plans in Regions that do not yet have one and updates in Regions that do.

3. In order to ensure that there is adequate funding for Round 2 of the Planning Grants, the \$30M should be divided evenly between the two rounds.
4. DWR has provided a list of sources for completing the Climate Change requirements of the Guidelines and PSPs. We believe that further guidance as to what DWR would consider an adequate climate change impact analysis in IRWM plans and applications is still required. Guidance from DWR needs to be completed soon in time for the first grant application preparation period.
5. The Scoring Criteria should clarify that DWR will consider awarding five points to a proposal from a Region that hasn't received any IRWM grants in the past, including funding from Proposition 50 and 84, and a higher Proposal Funding match should result in a higher Proposal score.
6. We think the emphasis on the required Economic Analysis is unwarranted since it is not required as a part of law. It is onerous on smaller project proponents and on the Regions as a whole. We think the requirement should be deleted in its entirety and, failing that, be deferred to a second step, reduced in detail, and counted for fewer points in the proposed scoring criteria. If a two step application process is implemented, we recommend that in the first step, applications be evaluated on their stated costs and benefits the projects provide. If a Region is asked back for the second step, a much more streamlined Economic Analysis than is currently required is requested.
7. Please clarify the language on page 17 of the Implementation Grant PSP requiring proof of IRWMP adoption by "project proponents adopting the IRWM Plan". The USCR IRWMP recommends that proof of formal adoption be limited to what was required by law when the IRWMP was adopted.
8. Although this comment doesn't appear in the Guidelines/PSP, we would recommend that language be added such that the timing of adoption of an updated/amended MOU by an RWMPG does not impact the ability of a Region to apply for/receive grant funding.
9. The proposal in the Proposition 1E Guidelines to transfer \$40 million in flood management funding to Cal FIRE Fuels Management Grant Program is not consistent with the intent of Prop 1E and should be removed.
10. We've made some recommended language changes related to the definition of "consistent with an adopted IRWMP".
11. We recommend that DWR provide a firm contract execution date to Regions prior to the beginning of the Grant solicitation process, to aide Regions in selecting appropriately timed projects for inclusion in their Proposals. Also, we recommend DWR post the link to the boilerplate Grant Agreement prior to Draft

Grant award recommendations, so that Regions can begin legal review as soon as possible.

12. In response to DWR's request for comments on how DWR should evaluate consistency with IRWM Plan Standards, we recommend that DWR send local representatives and/or Funding Area Coordinators to IRWM stakeholder meetings/RWVG meetings regularly, in order to ensure that the IRWMP update is on course to meeting the Plan Standards and are being developed appropriately. This would allow DWR to provide feedback/technical assistance to the Region on an incremental basis. This would avoid Regions receiving a failing evaluation in future rounds after spending significant time and resources to update their IRWMPs, for an otherwise easily correctable issue. Making the process more of an iterative communication would serve Regions and DWR better by providing information on an ongoing basis.

Thank you for your consideration of these comments. If you have any questions, please call me at (213) 217-1600.

Sincerely,

Dan Masnada  
General Manager  
Castaic Lake Water Agency

cc: Upper SCR IRWMP RWVG Members  
Tracie Billington, Department of Water Resources  
Joe Yun, Department of Water Resources  
Tanya Meeth, Department of Water Resources  
Sue Hughes, County of Ventura  
Annette Hubble, Gateway COG