



## WATER RESOURCES ASSOCIATION OF YOLO COUNTY

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April 23, 2010

State of California  
Department of Water Resources  
Division of Integrated Regional Water Management  
Attn. Joe Yun  
Post Office Box 942836  
Sacramento, CA 94236-0001

RE: Comments on the Integrated Regional Water Management Proposition 84 and 1E Draft Guidelines and Proposal Solicitation Packages

Dear Mr. Yun,

On behalf of the Sacramento River Westside Regional Water Management Group (Westside RWMG), the Water Resources Association of Yolo County is submitting the following comments on the Department of Water Resources' (DWR) Integrated Regional Water Management (IRWM) Proposition 84 and 1E Draft Guidelines and Proposal Solicitation Packages (PSPs). The Westside RWMG is a collaboration of municipal and agricultural water suppliers, cities, watershed groups, resource conservation districts, and others in five counties within the Putah and Cache Creek watersheds (Colusa, Lake, Napa, Solano, and Yolo). We have been approved as a region through the Region Acceptance Process. The participants in the Westside RWMG are coordinating with each other and intend to pursue a planning grant, and potentially an implementation grant and Storm Water Flood Management grant, in accordance with DWR's guidelines and PSPs. We hope that DWR will be flexible in the final guidelines and PSPs - respecting the limited capacity of local agency resources.

### Comments:

Planning Grant Cost Share. We recommend that the 50% cost-share required for planning grants be reduced to 25%. We note that Proposition 50 required only a 25% local match for planning grants. A 50% match discourages RWMGs with disadvantaged communities (DACs) from applying for planning grants (and creating an IRWMP). Also those entities that did not receive any IRWM planning funds in the Proposition 50 process and who have not prepared IRWMPs will be disadvantaged with a higher match as they will have to start the IRWMP process from scratch. The Westside RWMG would like the same cost share language in the Proposition 84 implementation PSP to appear in the planning PSP (i.e. the match should only be 25% along with the note that cost share may be waived for disadvantaged communities).

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Implementation Grant IRWMP Update Requirement. The requirement to update a region's IRWMP to the current standards within two years of receiving an implementation grant should be relaxed for RWMGs with DACs receiving implementation grants. Working with DACs inherently takes time and RWMGs will not want to assume the risk of non-compliance of a strict timeline.

Clarification of Planning Grant Administrative Cost Eligibility. It would be helpful to applicants if DWR could revise the Planning Grant PSP to clarify the types of costs (categories and/or functions) that would be considered eligible reimbursable planning grant expenditures. Applicants expend a great deal of time and resources in developing and submitting planning grant applications and, if successful, planning grant expenditure documentation. Having a better understanding of what DWR considers to be eligible costs under the Proposition 84 grant funding program would be beneficial for both DWR and the RWMGs. The Westside RWMG would also like clarification on the eligibility of administrative costs as reimbursable expenses for planning grant application efforts (types, amounts, limits) as applicants are absorbing administrative costs associated with the DWR Proposition 84 funding program while maintaining regional governance structures to facilitate participation.

Thank you for the opportunity to comment on the draft IRWM guidelines and PSPs. We respectfully ask that you consider our comments when finalizing the IRWMP guidelines and PSPs.

Cordially,



William L. Marble

Water Resources Association of Yolo County, Chair

The Water Resources Association of Yolo County is a member of the Westside RWMG