



December 13, 2018

Attn: Carmel Brown
California Department of Water Resources
Division of Integrated Regional Water Management
P.O. Box 942836
Sacramento, CA 94236-0001

Subject: Coachella Valley IRWM Comments on DWR's Proposition 1 – Round 1 Implementation Grant Draft PSP and IRWM Grant Program Guidelines

Dear Ms. Brown,

The Coachella Valley Regional Water Management Group (CVRWMG) would like to start by thanking the California Department of Water Resources (DWR) for the opportunity to comment on the Proposition 1 (Prop 1) Round 1 Implementation Grant Draft Proposal Solicitation Package (PSP) and Integrated Regional Water Management (IRWM) Grant Program Guidelines that were released on October 5, 2018. CVRWMG has always supported the development of IRWM as an effective water management approach. CVRWMG continues to work together to develop a comprehensive IRWM Plan with Planning Partners involvement and support. Our specific comments on the Prop 1 Round 1 PSP are as follows.

1. CEQA and Permitting Deadline

CVRWMG understands that DWR wants to be assured that projects are proceeding on time and as described, however the California Environmental Quality Act (CEQA) requirements and permitting have proven to be obstacles in the past. Six months is not enough time to complete CEQA. This requirement will eliminate many of the integrated and collaborative projects that the IRWM emphasizes. This will prove to be a particularly large hurdle for the non-profits and smaller public agencies. CVRWMG requests that DWR extend the schedule for CEQA and permitting to one year for these reasons.

2. Construction Permits

CVRWMG requests that DWR clarify which permits are included in the requirement that project sponsors acquire “permits necessary to begin construction.” Does this include permits from U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board? CVRWMG requests that DWR be more explicit in which types of permits must be acquired to meet this criterion.

3. Project Benefit Justification

CVRWMG requests that DWR clarify where project benefits be justified in the application. Due to the restriction on the number of characters in the space provided, there is limited opportunity for applicants to include how the project can achieve the claimed level of benefits. Exhibit C of the Draft PSP states that benefits should be identified in the Project Description section of the Work Plan. The Work Plan is limited to five pages, which must include all tasks and deliverables, as well as project description and location information. We ask that DWR either provide a new section where applicants can justify project benefits or provide a larger page limit for the Work Plan. Either of these options would allow applicants to better justify each of the project benefits.

4. Missing Application Materials Deadline

CVRWMG requests that the Funding Areas are given twenty (20) business days to provide items that DWR finds to be missing if the application is deemed incomplete. The current Draft PSP only allows 5 days. The 5 days does not allow enough time for CVRWMG to notify the Local Project Sponsor (LPS) who then need to find the information and return it back to CVRWMG to return to DWR. To allow enough time for this to occur, we urge DWR to consider extending this deadline from 5 days to 20 days.

5. Funding Area Workshop Eligible Costs

CVRWMG appreciates DWR's willingness to meet with Funding Areas to help advance the pre-application process and discuss projects. We request that DWR clarify the eligible costs for the Pre-Application Workshop. For example, we are unclear if just the time spent at the Pre-Application Workshop is eligible, or if the time spent preparing and developing the Project Information Forms is also eligible. CVRWMG requests that its Pre-Application Workshop be scheduled on May 7, 8, 9, 15, or 16. These dates were agreed upon by the CVRWMG at a monthly business meeting.

6. Climate Change Mitigation Eligibility Requirement

CVRWMG requests that DWR clarify what the climate change mitigation eligibility requirement means. Is it strictly mitigation (i.e., greenhouse gas reduction or carbon sequestration), or can adaptation projects meet this requirement as well?

7. Grant Administration Cap

CVRWMG wants to thank DWR for increasing the grant administration cap and expresses support for the 10% limit on grant administration.

Thank you for your willingness to work with the regions to improve the implementation grant process. We look forward to continued collaboration with DWR on the IRWM program.

Sincerely,



Mike Nusser

On behalf of the Coachella Valley Regional Water Management Group
Water Resources Associate
Coachella Valley Water District
