

December 13th, 2018

901 P Street
Sacramento, CA 95814
Attention: Linda Woolridge

RE: Comments on 2018 draft Implementation Grant Proposal Solicitation Package and Integrated Regional Water Management Grant Program Guidelines

Dear Ms. Woolridge,

In October, Department of Water Resources (DWR) released the draft 2018 Integrated Regional Water Management Grant Program Guidelines and draft 2018 Implementation Grant Proposal Solicitation Package. The twenty-two California Resource Conservation Districts listed at the bottom of this letter appreciate the opportunity to comment on the draft documents.

Resource Conservation Districts (RCDs) throughout California have long been involved in facilitating projects and programs both directly funded by Integrated Regional Water Management planning grant dollars, and those funded by external partners but benefitting IRWMP approach to regional resource management. Projects conceptualized and implemented by RCDs and partners have resulted in benefits to water quality and quantity on a watershed scale, with highlights including:

- Tahoe RCD, a past and current IRWM partner on efforts focused on funding, prioritization, data management, and implementation for stormwater monitoring across the Tahoe Basin; community watershed planning for pollutant load reductions, fire prevention-focused defensible space, and invasive species control; and a BMP retrofit program focused on reducing non-point source pollution in the Tahoe region, among other projects.
- Gold Ridge RCD, a partner in a North Coast IRMP effort with Humboldt County as the lead, has put IRWM dollars into practice locally for multiple years which has resulted in increased water storage capacity, habitat protection for endangered Coho salmon, water quality improvement, and climate adaptation.
- Marin RCD, a past IRWM project lead and facilitator of project work focused on implementation of 27 Best Management Practices in a coordinated effort across sixteen private landowner properties, which collectively improved water quality, increased on-farm water availability, and enhanced habitat for dependent wildlife.
- Sonoma RCD, a past IRWM lead, coordinating multiple projects including removal of 150 acres of the highly invasive and water-intensive *Arundo donax* plant which resulted in water quality and riparian habitat improvement; reduction of sediment across 9.67 miles of hydrologically-connected roads, providing 8,258 cubic yards of sediment savings, water quality improvement, and elevation of habitat quality for the endangered Coho salmon; and rainwater catchment to offset 60,000 gallons per year of pumping to improve streamflow for dependent species and associated habitat.
- Monterey County RCD, a partner in watershed sediment source determination and management assessment; and in assisting farmers with implementing erosion and water runoff management practices impacting local water resources.
- San Mateo RCD, a past and current IRWM lead with projects including assistance for 25 local farms and 8 small water companies in coastal San Mateo County, resulting in benefits including

stabilization of water resources for a region entirely reliant on local water supplies to meet the needs of residents, businesses, agriculture, and protected natural through over 48 million gallons of new local water storage capacity and 51 million gallons per year of water conserved annually, protecting and enhancing streamflow for critically endangered Central Coast Coho salmon and threatened steelhead trout while ensuring the viability of small local farms protecting domestic water supplies from drought.

- Napa RCD, a partner in an IRWM funded San Francisco Estuary Salmonid Monitoring Program, supported the Center for Ecosystem Management and Restoration with aquatic habitat monitoring and study locations, landowner outreach, and field assistance in the Napa River watershed.
- Resource Conservation District of Santa Cruz County, past IRWM partner and project lead implementing numerous projects including drought response irrigation efficiency assistance to growers and managed aquifer recharge project implementation to benefit groundwater sustainability in a critically overdrafted basin.

Collective RCD comments on the draft 2018 Integrated Regional Water Management Grant Program Guidelines and draft 2018 Implementation Grant Proposal Solicitation Package include:

Unfunded Monitoring Mandates, p. 18: the draft guidelines provide a list of costs that are not reimbursable with grant funding, which reference operations and maintenance costs to include post-construction project performance and monitoring costs. However, post-project monitoring is listed among project requirements on p. 10 of the guidelines, making its inclusion as an unfunded cost a barrier to program participation. Post-project monitoring is also critical to measuring the success of implementation methods and adaptively managing approach where necessary to maximize project effectiveness for the benefit of target resources and dependent species.

Eligible Costs, p.18: As listed in these draft guidelines, indirect costs are not reimbursable which prevents IRWM participant and lead organizations from full recovery of funds expended in project work. The inability to charge overhead inadvertently limits applicants to those organizations that can absorb the loss, with smaller, primarily grant-funded organizations such as RCDs prevented from participating in the program. Other State grant programs administering Proposition 1 and Proposition 68 funds allow for use of a federally negotiated indirect cost rate, or a pre-set cap on indirect costs for applicants that do not have the federally negotiated rate.

Project Permitting, p.6: The 2018 draft Solicitation requires that all permitting be completed within six months of final funding award, or by agreement execution. This is not feasible for the majority of projects RCDs have been facilitating with IRWMP funds, the majority of which require exhaustive outreach, landowner coordination, and design with agency input prior to permit issuance. The regulatory complexity of many of these projects, including changing water rights, presence of state and federal listed species and TMDLs, makes it impossible to secure all permits within six months.

Reimbursement eligibility, p. 12: Additionally, the Solicitation says that only costs incurred after the final award date will be eligible for reimbursement. The timeline for permit completion, coupled with the inability to be reimbursed for time spent before grant award determination, essentially require that all projects included in the proposal are shovel-ready, or that Local Project Sponsors can cover the costs of project design and permitting. Smaller organizations such as RCDs do not have that type of capacity. This requirement will limit the number of applicants and projects that will apply to this program, who

otherwise may have been excellent applicants. Past rounds of IRWM funding have allowed applicants to bill for allowable expenses that were incurred before the final award date, helping to offset the cost of the onerous application process (400 staff hours for one round) and some project development and design.

California Resource Conservation Districts are committed to continuing our work with DWR and other public and private partners to improve water conservation and efficiency efforts to balance competing demands on limited water resources for endangered fish, domestic and agricultural uses. We hope that with incorporation of this feedback, the IRWM Grant Program will continue to be a strong and collaborative funding model that helps the State achieve its goals for water supply and quality.

Sincerely,



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California Association of Resource Conservation Districts



Anna Olsen, Executive Director
Cachuma Resource Conservation District



Yvonne Franco, District Manager
Coachella Valley Resource Conservation District

COLUSA COUNTY



Patti Turner, Executive Director
Colusa County Resource Conservation District



Chris Lim, Executive Director
Contra Costa Resource Conservation District

DEL NORTE



Linda Crockett, District Manager
Del Norte Resource Conservation District



Stephanie Moreno, Executive Director/ District Clerk
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Valerie Minton-Quito, Executive Director
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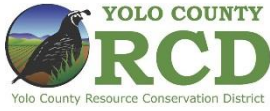
Nicole Cartwright, Executive Director
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Heather Nichols, Executive Director
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