



Santa Ana Watershed Project Authority

One Water One Watershed

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GOVERNMENT BY HARVARD'S KENNEDY SCHOOL



August 21, 2013

Philip L. Anthony
Commission
Chair

Assemblyman Anthony Rendon
Chair, Water, Parks & Wildlife Committee
State Capitol – Room 2136
Sacramento, California 95814

Celeste Cantú
General
Manager

Re: Draft 2013 Water Bond Framework

Orange
County
Water
District

Dear Assemblyman Rendon,

To the extent that the bond is intended to facilitate improved water reliability throughout the State, the best mechanism for applying State funding toward that goal is by funding IRWMP implementation. The concept and the promise of the IRWM approach are to cause local agencies to optimize the achievement of regional goals with the achievement of specified State goals.

Western
Municipal
Water District

The IRWM concept is broadly inclusive of all issues that involve water resources. This gives IRWMPs the strength of balancing competing interests and promotes synergistic, multiple-benefit projects at the regional level, and particularly on the basis of watersheds. The implementation of well developed IRWMPs should obviate the need to create numerous silos for State funding related to water supply, water quality, flood protection, storm water, ground water, etc., which adds complexity to a bond measure and to grant administration, and denies regions the flexibility to address multiple goals efficiently. If these silos were to be integrated, the allocation of funds to IRWMPs could be tripled, comprising sections V, VI, and VII of the proposed framework.

Eastern
Municipal
Water
District

Linking the achievement of State goals to the self-interested advancement of regional goals is the engine of ongoing implementation. The best use of State funds is to foster regional approaches that will continue to achieve State goals even after the use of the grant funds. It is for this reason the State has invested significantly in incentives to develop strong IRWMP processes. Having so invested, the State should make maximum use of these IRWMPs by insisting that investments in water resources be directed by IRWMPs.

San
Bernardino
Valley
Municipal
Water
District

Like any program, the IRWM program can be improved. The shift from project-specific grants to IRWMP grants has been hampered by lingering concerns about governance, accountability, and effectiveness. Governance of IRWM regional processes can be improved by evaluating the decade of experience of regions throughout the State, and creating new governance standards to be eligible for grant funding. It may be useful for DWR staff to identify impediments they perceive to a more flexible and streamlined approach to the use of IRWMP funds so that those concerns could be addressed through improved governance standards.

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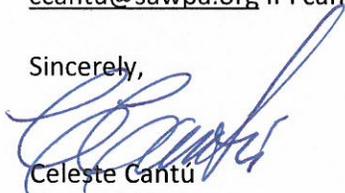
To ensure both accountability and effectiveness in the achievement of State goals with State funds, the State can require that IRWM implementation grant contracts include performance metrics based on the policies articulated in Public Resources Code Section 75026 and Department of Water Resources Guidelines. The establishment of minimum performance standards should be emphasized as replacing the need for the Department of Water Resources to review in detail the project by project costs and benefits associated with IRWM grant applications.

Additionally, to maximize the value to the State of IRMW implementation grants, the matching requirements should be increased from the current 25% to perhaps 50%. By so doing, the grants would continue to incentivize integrated regional management, but with even greater investment by local government in the process. In the longer term, this change would further a necessary shift in perspective regarding IRWMPs. Most local agencies involved in IRWM programs continue to view the process simply as a mechanism for obtaining and distributing State grant funds, rather than as an effective guide to the investment of local resources toward achieving regional water supply, water quality, flood risk management, habitat, and recreation goals. Increasing the funding match requirement would stretch State funds further while urging local agencies to greater ownership of their plans.

The inclusion in the draft framework of retaining assurances for water rights and area of origin protections raises some concern for a bond proposal that is aimed at achieving State goals and leaving all benefits to identifiable beneficiaries to be paid for by those beneficiaries. This concern is heightened by comments made on the earlier bond principles that discussed "regional self-reliance" rather than reduced reliance on the Delta. If water rights and area of origin protections are to be given prominent consideration in this discussion, they should be made a co-equal goal with the protection of investment backed expectations in the functionality of the State Water Project.

Thank you for the opportunity to offer these comments. Please do not hesitate to contact me at ccantu@sawpa.org if I can answer any questions or offer other assistance.

Sincerely,



Celeste Cantu
General Manager

CC:dm