

December 13, 2018

**TO:** Financial Assistance Branch Department of Water Resources 901 P Street PO Box 942836 Sacramento, California 942346-0001

**RE: Comments on Proposition 1 IRWM Implementation Grant Funding Draft Proposal Solicitation Package (PSP)**

Dear Carmel Brown and California Department of Water Resources,

The Upper Sacramento Regional Watershed Action Group would like to thank you for the opportunities provided to our region through the Integrated Regional Water Management (IRWM) program. Even more beneficial than over $8 million in funding, are the relationships formed over seven years of productive deliberation and focused collaboration. We are especially grateful for your recognition of economic hardships that limit progress in rural retired timber towns, and waiving the cost match requirement for Disadvantaged Communities.

As RWAG’s 2018 IRWM Plan Update nears completion, local agencies, tribes and community organizations have recently reviewed the comprehensive planning document. Feedback and discussion provided valuable insight into shared interests in the region, revealed lessons learned, and reaffirmed our commitment to collaborative watershed management. RWAG is making progress towards participatory governance in the Sacramento source watersheds, which is necessary for instilling climate confidence in California’s 21st century economies. With continued investment and support, Upper Sac IRWM can improve disaster preparedness, while reducing carbon emissions, and ensuring high-quality water supply reliability locally and downstream.

Upon review of the PSP, we submit the following comments:

1. The funding required for source water infrastructure improvements and climate preparedness in our area far exceeds the amount of funding available through Prop 1.

Priority water supply delivery, storage and sanitation infrastructure improvements that meet both local and state objectives amount to well over $60 million. Green infrastructure restoration projects that could protect local communities against catastrophic wildfire, improve water quality, increase habitat for biodiversity, and retain more water in the upper watershed for gradual delivery downstream in the dry summer months, could easily exceed $20 million. Projects designed to decrease reliance on fossil fuels and reduce carbon emissions could also amount to $20 million. With adequate funding, all of these projects could feasibly be achieved over the next three to five years.

In addition to the implementation projects listed above, a number of projects aimed at bridging data gaps, and improving support for watershed health, would significantly enhance the ability of USR stakeholders to exemplify integrated water management. We estimate that $1 million over the next five years for citizen science, stakeholder engagement, project integration and RWAG administration could amplify political will and multiply the amount of climate-related funding attracted to our region.

1. The Limited Waiver of Sovereign Immunity potentially dissuades tribal participation in IRWM, and obstructs funding for tribal projects that could significantly increase the carbon sequestration capacity of USR forests, while providing a range of ecosystem services and social benefits.

(We should discuss what the PSP actually says…it appears that it is the mechanism for auditing of expenses related to the grant. Other entities are also required to “open their books” so this waiver may be in place to make sure all grantees are subject to the same requirements.)

1. In Table 1 of the PSP, Proposal Eligibility and Project Eligibility appear distinct. Must each project directly improve local water supply reliability? Or if our proposal contains at least one project that improves water supply reliability locally, can additional projects that improve water supply reliability downstream be eligible as well?

According to preliminary calculations by the Sacramento River Funding Area (SRFA), the best-case scenario for USR funding availability for both rounds of Prop 1 is $4 million. While the need estimates indicated above entail a five-year horizon, at least 10% of the roughly $100 million would be needed over the next two years to earnestly launch a local effort to retrofit our infrastructure for climate compatibility. Optimally, the USR would have access to $5 million in the first round of Prop 1 funding, and $5 million in the second round.

Considering the energy invested and strides achieved thus far, we are deeply concerned that the limited amount available to our region in Prop 1 might also be the last breath of IRWM funding. Because each project listed in the USR IRWMP would provide multiple benefits to local DAC’s and downstream stakeholders, we are hopeful that DWR will find a way to continue and increase support for IRWM. We will be working to ensure that Disadvantaged Community Involvement (DACI) funds provide much needed, locally relevant, technical assistance over the next two years, and we trust that funding will be available through other agencies working to avoid climate collapse through cohesive planning and resilient watershed management.

Thanks again for your leadership in addressing California’s most urgent issues through collaborative planning, streamlined project implementation and empowering local stakeholders to manage water resources in as responsive a manner as possible.

Sincerely,

RWAG Coordinating Council

City of Dunsmuir – Bryce Craig

Winnemem Wintu Tribe – Mark Miyoshi

Pacific Forest Trust – Connie Best