

February 7, 2020

Nancy Vogel
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Sacramento, CA 95814



Submitted electronically to: input@waterresilience.ca.gov

Re: Draft Water Resilience Portfolio

Dear Ms. Vogel:

The Integrated Regional Water Management (IRWM) Roundtable of Regions (Roundtable) commends your team for conducting extensive public outreach to develop a comprehensive Draft Water Resilience Portfolio (Draft Portfolio). The Roundtable considers the Draft Portfolio and its recommendations an important step forward in helping address California's water management challenges. Indeed, the Roundtable, which is comprised of IRWM professionals with extensive experience in planning and implementing regional-scale water management programs, is committed to assisting in the Portfolio's implementation once finalized and has a stake in the outcome.

The Roundtable appreciates the opportunity to build upon our comments submitted September 4, 2019, which emphasized the benefits of utilizing the existing IRWM program approach as a platform for implementing the Portfolio. We are encouraged that the Draft Portfolio intends to build upon the progress made by IRWM Regions at local and regional scales (Recommendation #20). Additionally, the Roundtable submits the following comments to strengthen the recommendations relevant to IRWM:

1. **Recognition of IRWM as playing an essential role in implementation of the recommendations should be made more explicit. The Roundtable requests language be added, and direction be given to the identified State agencies responsible for the Portfolio's implementation, to make a direct linkage between established IRWM plans and multi-benefit project development.** The inherent strength of IRWM lies in its voluntary, collaborative structure, supported by established governance, and tied directly to planning and financially supporting multi-benefit projects. As a result, it is best suited to manage water resources in a transparent and collaborative fashion. **Exhibit A** includes a brief background on IRWM regional scale and configurations.

The clear benefit of utilizing IRWM for stakeholder engagement is recognized in the March 2017 Department of Water Resources (DWR) report, *Stakeholder Perspectives - Recommendations for Sustaining and Strengthening Integrated Regional Water Management* (Stakeholder Perspectives).¹ In developing the Stakeholder Perspectives document, IRWM practitioners and DWR collaboratively identified the strengths of IRWM, "...[a] practice...rooted in the principle of regional control, recognizing that local and regional water managers and other stakeholders,

¹ https://water.ca.gov/LegacyFiles/irwm/docs/IRWM_Recommendations.pdf

working together in a collaborative, open, and transparent manner, are best suited and best positioned to manage water resources in their regions.” The Stakeholder Perspectives further identifies the need to manage the diverse water resources in California through coordinated and integrated actions – the hallmark of IRWM, and the intent of the Draft Portfolio (Goal/Actions in Category #3).

The core principle of IRWM is the collaboration of local entities to improve water supply reliability and water quality to meet the state’s overall agricultural, domestic, industrial, and environmental needs by diversifying water portfolios, realizing efficiencies, integrating assets and reducing conflict at the local and regional scale. As such, IRWM should be utilized directly as a platform to support development of regional, multi-benefit, multi-stakeholder projects, and recognized as a mechanism to support recommendations 3.5, 4.1 and 11.3 of the Draft Portfolio.

The Roundtable requests the following language be added to these aforementioned recommendations: “Consideration should be made in developing and aligning grant guidelines and timing to prioritize multi-benefit projects included in and vetted through IRWM Plans.”

Additionally, the Roundtable requests that another recommendation be added under #13 to prioritize projects for streamlined permitting consideration if they are vetted through an IRWM Plan that meets DWR Plan Standards.

2. **Regulatory alignment recommendations in the Draft Portfolio should more specifically direct State agencies to take actions supportive of multi-benefit projects.** Recommendations 13, 20, 28, 29 and 30 recognize the importance of streamlined permitting and regulatory alignment; however, the focus is more on aligning funding sources/mechanisms, facilitating water budgets, and reducing plan redundancies. These actions are essential and cannot be fully addressed without concrete commitments to state regulatory alignment at the project level. **Language should be added in each recommendation, committing State agencies to take three key actions:**

- a. **Create a “Climate Resilience Forum” of representatives from water-related State agencies.** A “Climate Resilience Forum,” lead by the current Water Resilience Portfolio team, with oversight by the Resources Agency, should provide central leadership and resolve institutional overlap, operational constraints, interagency conflicts, competing agency priorities, and mis-aligned regulations. Multi-benefit projects are often stymied by increased costs to comply with state and federal environmental standards (e.g. CEQA/NEPA) due to lengthy review and design modifications to meet conflicting agency requests or mandates.

The “Climate Resilience Forum” should meet at least quarterly and be comprised of the heads of key state and federal agencies with project review oversight, including (but not limited to): DWR, State Water Resources Control Board (State Water Board), California Department of Fish and Wildlife, CalEPA, CALFIRE, Air Resources Board, Central Valley Flood Protection Board, Office of Planning and Research, Department of Conservation, Department of Finance, US Fish and Wildlife and the US Army Corps of Engineers. The

purpose of the Forum should be to ensure exchange of information and coordination to achieve multi-objective, sustainable management of watersheds to increase climate resilience including the objectives of catastrophic fire reduction, water quality improvements, water supply improvements, ecosystem improvements, and flood protection. Additionally, the forum should result in solutions to address conflicting regulations. Direction to staff at the local and regional levels should clearly provide flexibility to actively engage with project proponents, and during project review to support multi-benefit projects with stakeholder support.

- b. Examine opportunities to meet individual State agency objectives through an integrated planning approach across agencies to resolve potentially conflicting mandates.** Some state mandates directly conflict, constraining implementation of or preventing some beneficial projects from moving forward. For example, the South Orange County IRWM Plan prioritizes water supply portfolio planning, protection of natural resources, managing flood risk, and addressing surface water quality issues. A large-scale watershed restoration project currently in the planning stages to address all these priorities is challenged by conflicts between National Pollutant Discharge Elimination System (NPDES) Permit requirements to reduce or eliminate dry weather flows and Resource Agency requirements to maintain flows for recognized habitat downstream.

The project actively seeks to address both sets of requirements, but flexibility by the state and federal agencies is essential to the project's success and to realize the greatest benefit to the watershed. IRWM Region representatives are actively engaging staff at the applicable state and federal agencies; however, the process to resolve these conflicts must be supported by state policy. A letter submitted for your consideration September 27, 2019 by David Gibson, Executive Officer of the San Diego Regional Water Quality Control Board, further supported the importance of locally driven efforts to achieve better regulatory alignment in support of integrated projects (**Appendix B**).

- c. To achieve the goals of proposed action 13.1, the "Climate Resilience Forum" should designate and support local working groups of agency staff to coordinate grant and loan programs and streamline permitting.** Local working groups should be established that are comprised of state and federal agencies to support the planning and permitting of watershed management and ecological restoration projects, similar to the Bay Regional Restoration Integration Team (BRRIT) model in the Bay Area. Project proponents bring project concepts to the BRRIT and jointly discuss how to avoid regulatory conflicts and successfully implement the project

Projects resulting from stakeholder-driven, multi-agency, multi-sector planning should include regular coordination with resource and regulatory agency staff at the local level to ensure design can meet all applicable requirements and to help local project proponents resolve any regulatory conflicts. High-level support for local agency staff to engage with projects early, to consider options for streamlined permitting, and to recognize holistic benefits of large-scale projects over site-level constraints should be explicitly added to the

applicable recommendations included under Recommendation #13 of the Draft Portfolio. Additional consideration should be given to projects that have been developed through an integrated approach and prioritized by a recognized IRWM Region.

3. **The Resources Agency should form a stakeholder advisory committee to advise the “Climate Resilience Forum” (see recommendation #2a above) and other State agencies on Portfolio implementation efforts, and to help track progress.** The Stakeholder Advisory Committee should include representatives of the IRWM Roundtable of Regions, Tribes, the Association of California Water Agencies (ACWA), and water-related professional associations such as the California Stormwater Quality Association (CASQA), Flood Management Association (FMA) and California Groundwater Association (GSA). The committee should also include representatives of disadvantaged and other under-served communities, environmental, agricultural, headwater interests, and possibly others. The Advisory Committee should meet quarterly. The California Water Commission should also help monitor and advise state efforts to implement the Portfolio.
4. **To implement many of the Draft Portfolio recommendations, the Roundtable recommends building on the existing IRWM program, which has a record of success.** Across the state, IRWM Planning Regions are typically the most representative and inclusive regional water resource management group and have governance structures in place to address complex regional challenges. Created as a result of the IRWM Planning Act of 2002, IRWM regions cover 87% of the state’s geographic area and represent 99% of the state’s population. Working through the 48 regions, the state’s IRWM Grant Program has funded more than 840 projects providing multiple benefits such as improved water quality, increased resiliency to climate change, better flood management, restored and enhanced ecosystems, and more reliable local surface and groundwater supplies. The specific applicable Draft Portfolio recommendations are noted in the table beginning on page 10.

Portfolio Recommendations & IRWM Values:

- **Integrated planning:** IRWM has a proven track record of supporting planning and implementation of integrated local resource management and supply development, which is essential to building resilient water supplies.
- **Diverse stakeholder collaboration:** IRWM offers an established forum for diverse stakeholders to meet, communicate and collaborate for the greater regional good.
- **Support of Disadvantaged Communities (DACs), Under-represented communities and Tribes:** IRWM offers an established, proven means to engage, build capacity, and support projects from Tribes, disadvantaged and other under-represented communities.
- **Ability to Leverage funding:** The State has invested \$2.31 billion in IRWM bond funding through Prop 50 (2002), Prop 84 (2006), Prop 1E (2006), and Prop 1 (2014). According to the Department of Water Resources (DWR), the local funding match to the state’s investment is impressive – an estimated ratio of 4:1.
- **Embraces regional goals that support statewide objectives:** Each of the 48 IRWM regions have created integrated regional water management plans that support many of

the Governor's seven principles for the Draft Portfolio including regional approaches among water users sharing watersheds.

Examples of IRWM Successes:

- **Connections:** Formed in the **North Coast IRWM Region**, [The North Coast Resource Partnership](#) (NCRP) is a long-term, innovative and successful collaboration among Northern California Tribes, counties, water and wastewater service providers, resource conservation districts, private landowners, businesses, cities, and environmental and agricultural groups to enhance the quality of life in the North Coast.
 - **Planning:** [One Water One Watershed](#) (OWOW) is an innovative planning process for the **Santa Ana River Watershed IRWM** that integrates water resource management with various disciplines such as land use planning, groundwater management, flood control, and natural resource management – and serves as the region's IRWM Plan.
 - **Disadvantaged Communities:** [Mojave Water Agency's Small Water System \(SWS\) Assistance Program](#) developed through the **Mojave IRWM Plan**, has leveraged over \$2.3 million to support disadvantaged and severely disadvantaged SWSs that lack the technical, managerial and financial resources to test for and detect leaks, certify and train operators, support consolidation efforts and address water quality standards through Maximum Contaminant Load (MCL) treatment projects.
 - **Communications:** **Inyo-Mono IRWM** has developed a video, *Living in the Rain Shadow*, that identifies how rural communities in the Eastern Sierra have benefited from IRWM. The video can be seen at: <https://vimeo.com/98829203>
 - **Collaboration:** **San Diego IRWM** has funded two phases of a project that brought together 10 water and wastewater agencies on a regional project to improve connectivity between individual recycled water facilities in North San Diego County. The project will increase use of recycled water by allowing it to be distributed across the North County region and will produce an estimated 6,790 acre-feet of recycled water annually. The project benefits include reducing imported water dependency, decreasing discharge of recycled water to the ocean and reducing energy consumption from pumping imported water.
 - **Watershed Focus:** **Watersheds Coalition of Ventura County IRWM** is structured based on a watershed approach; the governance structure includes 3 semi-independent watershed groups, a leadership committee including 2 representatives from each watershed; and the general membership inclusive of all stakeholders in the region. Each watershed group addresses the unique needs and interests of its stakeholders and water resource characteristics in planning and project identification. Ultimately decisions are made by the full regional group, balancing the needs and goals of each watershed with those of the entire region.
- 5. Capitalize on existing IRWM Plans which encompass much of the planning the Draft Portfolio embraces.** Each of the regions have adopted an IRWM Plan through a governance process that meets State Plan Standards set by DWR. These comprehensive regional plans address multiple Draft Portfolio recommendations by including water supply, flood management, water quality,

environmental restoration, recreation, land use, environmental justice, stakeholder engagement, and other state and community interests directly in plan strategies. An IRWM Plan is a “a voluntary and comprehensive, non-regulatory planning document prepared on a region-wide scale that identifies broadly supported priority water resources projects and programs with multiple benefits. The process of creating an IRWM Plan is locally driven and includes input from many diverse stakeholders. A key difference in IRWM Plans (as compared to other planning documents) is that IRWM Plans integrate multiple water management strategies to solve multiple priority challenges.”²

IRWM Plans identify climate change risks, addressing Draft Portfolio Recommendation #31.

IRWM Plans include assessments and 20-year planning estimates for water demands and supplies, surveys and priority actions for DACs, and assessments of climate impacts on regional infrastructure and identification of adaptation and mitigation responses. Vulnerability analyses are required by the state’s IRWM Plan Standards. At a minimum, the analyses must be equivalent to or exceed the DWR analysis in the Climate Change Handbook for Regional Water Planning, Section 4 and Appendix B. The analyses are further described in the IRWM Proposition 1 IRWM Program Guidelines, Volume 2, IRWM Planning Standards (Pgs. 43-43, 69-72).

- 6. Assistance is needed to support regions where IRWMs have faced challenges.** The Roundtable understands that all regions are not the same and face unique challenges and opportunities. A recent Roundtable survey of its members identified the following barriers to success:
- **Lack of funding for IRWM Coordinator and other administrative needs.** Some regions, typically sparsely populated rural regions, do not have funding for an IRWM Coordinator to convene stakeholders, facilitate meetings, periodically call for projects for inclusion in their IRWM Plan, update IRWM Plans, apply for grants or coordinate planning for multi-beneficial regional projects.
 - **Cost to participate for some stakeholders.** Representatives of small water and wastewater service providers, Tribes, non-profit organizations, and DACs are frequently challenged to participate without stipends for time and travel.
 - **Distance to travel.** In many regions, stakeholder participation is limited by the hours required to travel to IRWM meetings. Whether the time is impacted by the number of miles or time spent in traffic congestion, stakeholders are constrained by the demands on their limited time. Some regions do not have the technology or funding to support teleconferencing.
 - **Lack of resources and capacity, particularly for DACs, to submit projects.** Many DACs and rural communities lack the technical capacity to plan a project, complete the engineering design, and make the project shovel-ready and eligible for grant funding. There is a need for technical assistance.
 - **Lack of funding to prepare grant applications.** Some regions lack the funding to prepare grant applications.

² Madera IRWM: <https://www.maderacountywater.com/regional-water-management-group/>

- **Competition for limited funding.** It isn't easy to get an IRWM grant. In some cases, stakeholders do not participate because the chance to fund needed projects is outweighed by the limited opportunity to secure funding. This is particularly problematic in rural areas with smaller populations. Current IRWM grant funding allocations are based on population rather than benefit. While the Sierra supplies 60% of the state's water, the IRWM regions in that area received just 5% of Prop 1 funding. Smaller water agencies, non-profits and other organizations with immediate needs and limited resources don't find value in participating in a process that will not likely yield sufficient benefits to them.

In addition to the proposals detailed in the Draft Portfolio, namely #13.1 (coordination of loan and grant programs) and #20.2 (building on the IRWM program), three strategies would immeasurably help all IRWMs to be successful:

- a. **Baseline funding is needed to support IRWM Regions and should be provided from General Funds, not bond funding** to ensure consistent year-to-year funding and as part of the state's commitment to supporting effective regional planning. To ensure continuation of the principles of IRWM, such as regional water planning and outreach to overburdened communities, the IRWM Roundtable of Regions recommends that \$13 million in baseline funding be allocated to support the ongoing planning and stakeholder engagement functions of IRWM regions.

Many of the IRWM regions, especially the more rural ones, have historically relied on State funding to support their IRWM Program. Meeting the expectations of the Draft Portfolio to plan across water sectors and watershed scales is a challenge for any Region; however, water resource planning over large geographic areas presents logistical challenges not faced ubiquitously throughout the state. Baseline funding will assist with meeting the demands of engaging stakeholders over large areas. The Recommendations should also direct State agencies to work with stakeholders to further quantify the financial support needed to execute the final Portfolio at the regional level, which may require additional technical assistance.

An amount of up to \$250,000 per region would help ensure that the activities of these regions would continue. Among the essential activities that baseline funding would provide for:

- IRWM program staff including an IRWM Region Coordinator,
- Continued stakeholder meetings,
- Outreach to DACs and Tribes,
- Possible stipends for tribal, DAC and NGO representatives to participate, and
- Continued collaboration to identify and fund regional multi-benefit projects that seek to address water-enhancing supplies, water climate change and other Portfolio objectives.

The Governor's draft budget includes "\$35 million ongoing General Fund to support various resources investments that align with the draft Water Resilience Portfolio, including Sustainable Groundwater Management Act implementation and enhancements to the Department of Fish and Wildlife." This budget item should include IRWM baseline funding.

- b. **Planning grant funding, in addition to baseline funding, is needed to help regions to conduct important planning studies such as updating IRWM Plans, project feasibility studies, and CEQA review for integrated regional water management projects.**
 - c. **Implement the strategies identified in the Stakeholder Perspectives document.** DWR engaged a very large and diverse group of stakeholders and spent considerable time, energy, and funds to develop the overall vision for the future of IRWM and a comprehensive set of actions necessary for sustaining and strengthening the IRWM program. They spent considerable time, energy, and funds to identify the comprehensive set of strategies and actions listed in report. Published in March 2017, the introduction states "While significant progress has been made in advancing IRWM, more must be done." Although there is broad support at the state level for the 71 actions recommended in the Stakeholder Perspectives document, few strategies have actually been implemented. Implementation of the strategies would significantly strengthen IRWM and, in turn, support realization of the goals of the Draft Portfolio.
7. **Coordinate Draft Portfolio implementation with all water resource planning groups in a region.** Collaboration and coordination are key to regional water resource planning. To achieve the Draft Portfolio recommendations 3.5, 11.3, 13, 25.7, 28, 29, and 32.2, all water resource planning groups in a region should closely coordinate their activities to satisfy the diverse recommendations of the Draft Portfolio and achieve the goals of the IRWM Disadvantaged Communities Involvement (DACI) program and Tribal outreach.

The Roundtable requests language be added to recommendations #20 and 28, supporting integration of other planning efforts with established IRWM Plans, bolstering IRWM Plan Standards to support the Draft Portfolio, and to be better supported by the California Water Plan. The agencies within the California Natural Resources Agency and Cal EPA should require coordination with IRWM Regions as part of any funding agreements. This will help emphasize the value of inter-connectedness and building relationships necessary to execute the Draft Portfolio's recommendations. It will also support inter-region data collection/sharing, goal setting, and development/implementation of multi-benefit projects.

Implementation of the Sustainable Groundwater Management Act (SGMA) must be coordinated with, rather than leading, regional water resiliency programs such as IRWM. The process established to implement SGMA is repeatedly mentioned as potentially leading Portfolio implementation, yet Groundwater Sustainability Agencies (GSAs) cover less than 50% of the area of the state and are wholly concerned with groundwater issues. As previously mentioned, IRWM regions are established at a different regional scale and encompass a much

larger proportion of the state. In a recent Roundtable membership survey, 77% of respondents indicated that their Region coordinates voluntarily with local GSAs. The State Water Board and DWR need to consider the relationship of SGMA and IRWM and develop a coordinated policy to best integrate a voluntary effort (IRWM) with a regulatory effort (SGMA) without sacrificing the mandate, purpose or value of either.

8. Reflective of Recommendation #20, **the Roundtable recommends allowing IRWM Regions to redefine their geographic boundaries if they so desire.** If applicable, IRWM regions should re-evaluate the effectiveness of their current planning scale, then reaffirm or re-define themselves, subject to state approval. As stated in the guidelines for IRWM planning regions developed by DWR, “no single physical size, organizational structure, or governance definition applies uniformly to all areas in the state. The configuration of the 48 IRWM regions, all of which were approved by DWR, vary significantly across the state. This is appropriate given the complexity and extremely wide variety of hydrologic, geologic, climatologic and ecologic conditions, land use conditions, jurisdictional circumstances, and societal and cultural needs found in California.”

9. **Support education and awareness efforts which will promote and inform success of the Portfolio. The Roundtable requests that a recommendation be added to the Draft Portfolio under Recommendation #32 dedicating state funds to increase public awareness of the benefits resulting from support for stakeholder-driven, multi-benefit regional projects.** Public education and outreach should be explicitly supported by the final Portfolio. Successful implementation of the Portfolio will depend on public understanding of the benefits of locally-driven integrated planning – a central thesis of the Portfolio and IRWM. In a letter dated October 8, 2018, developed in consultation with other organizations, the Roundtable requested assistance from DWR for the development of informational videos to address the critical need to improve public understanding of IRWM and integrated, multi-benefit projects. A copy of the Roundtable’s letter is included as **Exhibit C**. Although no formal response was ever received from DWR, the Roundtable still strongly believes that these informational videos are needed to enhance public awareness of the role of IRWM in water resilience.

10. **The California Water Plan must play a key role in supporting the implementation of the Water Resilience Portfolio, implementation of the IRWM Stakeholder Perspectives recommendations, and the Regional Water Atlas referenced in Appendix 3, Section 3, page 122 of the Draft Portfolio.** To fulfill this role, the Water Plan must be improved to more accurately reflect the nature and variability of local and regional conditions, and water management needs throughout California. IRWM regions and local agencies spend considerable time and effort collecting information on water conditions, and to establish regional and local water management goals and project needs. The State should make use of this valuable information as part of the Water Plan update process and to properly implement the Draft Portfolio, guide the State’s ongoing planning efforts, and substantiate State policies.

The Roundtable has engaged with DWR on the Regional Water Atlas. This is an important tool for data collection and multi-benefit planning. The Roundtable considers the Regional Water Atlas as essential to the implementation of the Water Resilience Portfolio and for ensuring

conclusions and recommendations in the Water Plan support IRWM implementation. It is our understanding that completion of the full atlas has stalled due to lack of funding and/or priority. IRWM Region representatives have expressed strong support for moving forward quickly with completion of the atlas. **The Roundtable requests that language be added to recommendations #22 and #32 of the Draft Portfolio supportive of this tool, with a nexus to how it will support prioritization of regionally beneficial multi-benefit projects – both through funding and streamlined permitting.**

11. Draft Portfolio recommendations should address the need to better integrate and find linkages between the many state-sponsored water-related plans – both regulatory and voluntary. As regional water managers and key stakeholders in state plans and policies, it can be very unclear how plans with overlapping water resource benefits fit together.

We believe that the Climate Resilience Forum (see recommendation #2a of this letter) must lead an effort to carefully review each of the State’s water-related planning efforts/requirements. This review should result in reforms, where needed, to improve plan linkages and integration, where appropriate. This includes articulating how the California Water Plan uses other, component plans in its development. This recommendation would further support the Draft Portfolio’s proposed action #28.1.

SUMMARY OF COMMENTS ON SPECIFIC RECOMMENDATIONS OF THE DRAFT PORTFOLIO

Action	Recommendation
Maintain and Diversify Water Supplies	
1.1	<p><i>Implementing the Safe and Affordable Drinking Water Act of 2019 by providing interim water to 75 drinking water systems or schools, planning assistance for 100 systems and permanently solving an additional 100 systems by the end of 2020.</i></p> <p>This recommendation does not go far enough to support struggling systems. There are over 1,500 water and wastewater service providers in the Mountain Counties IRWM Funding Area alone; many are DACs with contaminated water and underfunded operations. The Prop 1 DAC Involvement Grant, administered by DWR, required an assessment of DAC challenges and technical assistance needs. The Roundtable recommends using the DWR DAC assessments to identify immediate needs, then use SB 200 Safe, Affordable drinking Water Act funds to permanently solve the deficits of these systems by 2023, and 100% of drinking water systems by 2030.</p>
1.2	<p><i>Increasing financial capacity to support drinking water projects through the Drinking Water State Revolving Fund and other state and local funding mechanisms.</i></p> <p>While increasing financial capacity is a laudable goal, the Roundtable recommends to also include an increase in technical assistance. Technical assistance is needed to help small drinking water systems take a project from a concept to shovel-ready – which is necessary before they can even apply for funding. IRWM regions are an ideal structure for providing such assistance.</p>

Action	Recommendation
	<p>In addition, the Roundtable recommends waiving local match and reimbursable grants for DACs and other underserved communities.</p>
Protect and Enhance Natural Systems	
13	<p><i>Simplify permitting to help launch more multi-benefit, multi-partner projects.</i></p> <p>Lack of regulatory alignment is a major barrier to implementing multi-benefit, multi-partner projects in a timely and cost-effective manner. The Roundtable recommends that the Governor establish local forums comprised of state and federal agencies to support the planning and permitting of watershed management and ecological restoration projects, similar to the Bay Regional Restoration Integration Team (BRRIT) model in the Bay Area. Project proponents bring project concepts to the BRRIT and jointly discuss how to avoid regulatory conflicts and successfully implement the project. See recommendation #2c of this letter for further information on this request.</p>
13.1	<p><i>Coordinate grant and loan programs across state agencies to make funding for multi-benefit projects easier to arrange and leverage.</i></p> <p>The Roundtable recommends a joint Task Force of State agencies to standardize grant applications. Currently each agency has their own proprietary process for accepting applications, scoring and awarding grants. A standardized application would reduce the burden in terms of time and money spent by project proponents to meet the differing criteria. Also, better alignment of grant schedules would assist project proponents with project planning.</p>
15	<p><i>Encourage investment in upper watersheds to protect water quality and supply.</i></p> <p>The Roundtable strongly agrees. In the Prop 84 and Prop 1 IRWM grant programs, funding was allocated throughout the state based largely on population. The Roundtable consider into account other relevant metrics such as the benefits to the state’s water supply that a region provides. As an example, the Sierra Nevada area plays a critical role in California’s water supply and hydrological system but received just 5% of Prop 1 funding.</p>
15.3	<p><i>Utilize the Governor’s Forest Management Task Force to explore how investments and programs in forest resilience may improve watershed natural functions, including water quantity and quality benefits, and how water management can enhance forest health.</i></p> <p>The Roundtables makes the following two recommendations:</p> <ol style="list-style-type: none"> 1. Current grant programs are siloed and restrict multi-benefit projects. Forest health involves landscape-scale projects that address wildfires, tree mortality, habitat restoration and enhancements, and other climate impacts. Utilize the Climate Resilience Forum proposed in the Roundtable’s recommendation #2a on page 2 of this letter to align grant programs and streamline permitting.

Action	Recommendation
	<p>2. Engage Tribes to share Traditional Ecological Knowledge (TEK) with state agencies. TEK refers to a cumulative body of knowledge, belief, and practice, evolving by accumulation of TEK and handed down through generations through traditional songs, stories and beliefs. Learning about the ways in which the indigenous people of California managed the environment could teach agencies alternate ways to address climate impacts.</p>
18.2	<p><i>Complete a climate change vulnerability assessment and adaptation strategy to protect people, with a particular focus on DACs, habitat, water quality, and supply (For the Sacramento-San Joaquin Delta).</i></p> <p>Numerous assessments have been completed by a variety of state agencies, as well as individual IRWM regions in the Sacramento-San Joaquin Delta area through IRWM Plan updates to meet Prop 1 plan standards. Instead of yet another assessment, the Roundtable recommends that the various studies be identified, then reviewed for accuracy and relevance and combined to create one definitive assessment. Since individual regions are unique, adaptation strategies should be developed by local stakeholder groups.</p>
Build Connections	
20	<p><i>Support groups and leaders in each of the state’s regions to develop and execute integrated water resilience strategies.</i></p> <p>The Roundtable recognizes that the breadth of water management and planning included in the Draft Portfolio is done at many levels, one of which is IRWM Regions. The Stakeholder Perspectives document recognizes this and emphasizes that IRWM should be the building block for regional planning. The Roundtable recommends that the Stakeholder Perspectives document should be referenced in Appendix 3 Section 3 of the Draft Portfolio.</p>
20.1	<p><i>Build on the Integrated Regional Water Management Program and other regional efforts to align climate scenarios and expand watershed-scale coordination and investments that contribute to water resilience.</i></p> <p>The Roundtable recommends adopting IRWM as the principle framework for implementing the Portfolio at the regional level and strengthening its effectiveness (see the Roundtable’s recommendation #1, page 1). This is appropriate because IRWM offers:</p> <ul style="list-style-type: none"> • An established forum for diverse stakeholders to meet, communicate and collaborate for the greater regional good. • A proven track record of supporting planning and implementation of local water supply development which is essential to building resilient water supplies. • An established means to support projects benefitting disadvantaged communities and other under-represented populations.
20.2	<p><i>Structure funding sources to reduce the hurdles for water projects that reflect integrated solutions, produce multiple benefits, and improve watershed function.</i></p>

Action	Recommendation
	<p>The Roundtable recommends streamlining processes for grant applications, invoice processing and contract negotiations. A multi-agency Task Force could also address the coordination of grant and loan programs across state agencies to make funding for multi-benefit projects easier to arrange and leverage (Action 13.1)</p>
22.3	<p><i>Streamline data submission and reporting to the state.</i></p> <p>The Roundtable recommends utilizing the consortium formed in response to the Open and Transparent Water Data Act (AB1755) to review the quantity and quality of data requested from water agencies and other organizations.</p>
Be Prepared	
28	<p><i>Institutionalize better coordination across state agencies.</i></p> <p>The Roundtable recommends convening a Climate Resilience Forum composed of the heads of invested State agencies. See Roundtable recommendation 2a on pg. 2 for greater detail. Better coordination across State agencies will help address a myriad of other issues including funding, project planning, priority setting, policy setting, etc.)</p>
29	<p><i>Partner with key non-state partners to improve coordination and alignment.</i></p> <p>The Roundtable recommends enhancing the collaborative participation between State agencies and key stakeholder groups such as the Roundtable, ACWA, GRA, FMA, CASQA and other groups to build on the knowledge and experience of these groups. IRWM Plans, Urban Water Management Plans, Stormwater Resource Plans, Groundwater Sustainability Plans, Flood Protection Plans, etc. all contain a wealth of information, policy guidance, potential projects, implementation goals and priorities, and data that can help inform coordination and alignment and guide leaders in organizing specific water resilience portfolios in each region.</p>
31.1	<p><i>Include water portfolio priorities in the discussion of a potential climate resilience general obligation bond.</i></p> <p>The Roundtable supports the Governor’s proposed budget and applauds his request for a 2020 Water Bond. The Roundtable offers bond language for the proposed \$1 billion for regional and inter-regional water resilience and the \$270 million system-wide multi-benefit flood request. Please see Appendix D for suggested Bond Principles.</p>
32.2	<p><i>Gather stakeholders from across the state each year to discuss progress implementing this Portfolio and more broadly achieving water resilience across the state.</i></p> <p>The Roundtable recommends convening an annual conference. Many successful examples abound including the statewide Prop 1 Lessons Learned conference hosted by the IRWM Mountain Counties Funding Area in November 2018, as well as ACWA, CASQA FMA and the Water Education Foundation annual conferences. The conferences provide opportunities for stakeholder to discuss issues, and share successes and lessons learned.</p>

In summary, the IRWM Roundtable of Regions supports the goals of the Draft Water Resilience Portfolio and appreciates the opportunity to provide comments and additional recommendations. The Roundtable looks forward to actively participating in implementing the Final Portfolio recommendations. Thank you for this opportunity to comment on the Draft Portfolio. If you have any questions or wish to further discuss any of our recommendations, please contact our Network Coordinator, Jodie Monaghan, at jodie@jmconsultants.net or (916) 616-1134.

Respectfully,



Lynn Rodriguez
Co-Chair



Mark Stadler
Co-Chair

- Exhibits: A – Background on IRWM Region Scale and Configuration
B – San Diego Board Comments on the Water Resilience Portfolio
C – IRWM Letter to DWR Requesting Production of Videos
D - Suggested Water Bond Principles

cc via email: IRWM Roundtable of Regions Network members
Wade Crowfoot, Secretary for Natural Resources, California Natural Resources Agency
(secretary@resources.ca.gov)
Karen Ross, Secretary of Agriculture, California Department of Food and Agriculture
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Jared Blumenfeld, Secretary for Environmental Protection, California Environmental
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Cindy Messer, DWR Chief Deputy Director, (Cindy.Messer@water.ca.gov)
Kristopher Tjernell, Deputy Director of DWR Integrated Watershed Management
Program (Kristopher.Tjernell@water.ca.gov)
Arthur Hinojosa, Chief of DWR Integrated Regional Water Management Division
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Erik Ekdahl, SWRCB Deputy Director (Erik.Ekdahl@waterboards.ca.gov)
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Joe Yun, California Water Commission, (joseph.yun@water.ca.gov)



EXHIBIT A

IRWM ROUNDTABLE OF REGIONS

Background on IRWM Region Scale and Configurations January 2020

Recently, members of the Integrated Regional Water Management Roundtable of Regions (Roundtable) have encountered suggestions that regional water resource resilience planning and management should be conducted at a scale that is different from California’s forty-eight state-approved Integrated Regional Water Management (IRWM) Regions. Some have suggested that IRWM regions should universally conform to watershed, river basin, or groundwater basin boundaries. Other suggestions are that IRWM region governance should be changed, or that new additional water management entities are needed to address larger scale issues.

We have noted that, in some cases, there is only limited understanding or appreciation of how the state’s 48 IRWM regions were established by local agencies, Tribes, and other interests, and then approved by the State, to maximize opportunities for water management integration at the regional scale. The scale and configuration of IRWM regions varies significantly throughout California reflecting the State’s remarkable hydrologic diversity, the nature and complexity of its water infrastructure systems, local government considerations, and societal needs.

The Roundtable has developed the following summary information about the genesis and nature of California’s forty-eight IRWM regions, including their configuration and scale. Information is also provided on how IRWM can be upscaled, where needed, through inter-IRWM region cooperation to address water management issues larger than an individual region. This summary is intended to help improve understanding of IRWM and to support discussions for the advancement of IRWM and water resilience. Finally, the information provided supports the fact that, when it comes to IRWM regions, one scale or configuration does not fit all.

Formation of California’s IRWM Regions

California’s 48 IRWM planning regions were defined by local agencies, Tribes, non-profit organizations and other stakeholders, and were accepted by the State in accordance with guidelines developed by the California Department of Water Resources (DWR) pursuant to Water Code Section 10541(f), which, states, in part:

“At a minimum, a region shall be a contiguous geographic area encompassing the service areas of multiple local agencies, and **shall be defined to maximize opportunities for integration of water management activities**. The department [DWR] shall develop a process to approve the composition of a region for the purposes of Sections 75026, 75027, and 75028 of the Public Resources Code.” [emphasis added]

DWR established the process for approving IRWM regions in 2009, as described in DWR's final IRWM region acceptance process guidelines

(http://www.water.ca.gov/irwm/grants/docs/Archives/Prop84FirstRAPCycle/RAP%20Documents/IRWM_RAP_Final.pdf). In this acceptance process document, DWR states:

“Since the inception of the IRWM grant program, **DWR has encouraged and supported the formation of self-determined IRWM regions**. However, effective guidance in IRWM region development has been challenging, because there is **no single physical size, organizational structure, or governance definition that applies uniformly to all areas in the state**. IRWM regions are dynamic and evolving and as IRWM regions change, it is important that those changes be understood at local and state levels and that the changes work toward the goals of better regional water management.” [emphasis added]

DWR goes further in the document to address the scale and configuration of IRWM regions, stating:

“The IRWM region must consider the broad variety of the water systems being managed in the planning area, including:

- Water supply;
- Water quality;
- Environmental stewardship;
- Flood management;
- Drought preparedness;
- Wastewater treatment;
- Watershed management;
- Recycled water;
- Groundwater management <format issue I can't seem to fix>
- Land use;
- Natural habitat and conservation;
- Conjunctive use; and
- Emphasis on reduced dependence on imported water.”

At its completion, the State's IRWM region acceptance process allowed California's forty-eight IRWM regions to suitably reflect the complexity and extremely wide variety of hydrologic, geologic, climatologic and ecologic conditions, water infrastructure systems, land use conditions, jurisdictional circumstances, and societal and cultural needs across California. Consequently, the configurations of IRWM regions vary significantly across the state. Depending on regional circumstances, individual IRWM regions can encompass:

- Multiple groundwater basins and/or watersheds mutually affected by regional growth processes, land use and local government jurisdictions, ecosystem conditions and linkages, and/or water infrastructure systems.<changing indent format problem>
- Single watersheds, large enough to include a manageable number of jurisdictions and communities for maximizing opportunities for regional water management integration, but not so large that integration efforts would become unwieldy or impossible due to overly large numbers of entities involved. Some single-watershed IRWM regions in the state include multiple groundwater basins, or overlies only a portion of a large aquifer system.
- Portions of large watersheds and/or groundwater basins.

What IRWM Stakeholders told DWR

A lot of progress has been achieved in the advancement of IRWM in California since the adoption of the 2002 IRWM Planning Act by the California Legislature. However, the effort to achieve the full potential for regional and inter-regional water management integration is still very much in progress.

Beginning in 2012, DWR worked closely with IRWM practitioners and other stakeholders to identify ways to sustain and strengthen IRWM. By working with stakeholders over a three-year period, DWR identified four key strategies and more than 70 actions to sustain and strengthen IRWM. These strategies and actions were released by DWR in draft form in May 2015 and then were published, essentially unchanged from 2015, in DWR's March 2017 report titled, *Stakeholder Perspectives-Recommendations for Sustaining and Strengthening Integrated Regional Water Management*.

During development of the strategies and actions for IRWM, only a few individuals out of the hundreds of stakeholders engaged in the document's development suggested that the configuration of individual IRWM regions be changed. There was, however, very broad recognition that IRWM practices can and should be "upscaled" or "leveraged up", where needed, through inter-IRWM region cooperation and action to address any integrated management needs at scales beyond a single IRWM region. The stakeholder perspectives report is reflective of this and states:

"Today, IRWM regions provide the predominant and the most important context for integrated water management in California. But, in some areas, integration can also occur at geographic scales larger than individual IRWM regions. By working together through inter-regional efforts, IRWM regions can serve as the primary "building blocks" for integrated water management at larger scales. Depending on the area of the state, inter-regional integration opportunities include the management of aqueducts, extensive watersheds, entire groundwater basins, inter-regional flood management systems, and environmental protection and restoration efforts. Some IRWM regions are already working together to address these needs, but there is still more to be done inter-regionally in some areas."

Should the configuration and scale of IRWM regions change to improve outcomes, including water resiliency?

The work to define and approve the 48 IRWM planning regions has already occurred. A massive amount of human effort and a very large amount of funds have been expended in that effort and to build on it.

IRWM regions were established by local agencies, Tribes, and other interests, and then approved by the state, based on the fundamental tenet that,

"The practice of IRWM is rooted in the principle of regional control, recognizing that local and regional water managers and other stakeholders, working together in a collaborative, open, and transparent manner, are best suited and best positioned to manage water resources in their regions." (Stakeholders perspectives document)

IRWM regions must have the final say in determining the appropriate regional scale at which to plan. It is also essential that they be closely consulted and have a key role in addressing inter-IRWM region water management needs.

EXHIBIT BGAVIN NEWSOM
GOVERNORJARED BLUMENFELD
SECRETARY FOR
ENVIRONMENTAL PROTECTION**San Diego Regional Water Quality Control Board**

September 27, 2019

Nancy Vogel

Director of the Governor's Water Portfolio Program 1303

10th St., Suite 117

Sacramento, CA 95814

Nancy.Vogel@resources.ca.govinput@waterresilience.ca.gov**Subject: San Diego Water Board Comments on the Water Resilience Portfolio**

Dear Ms. Vogel,

The California Regional Water Quality Control Board, Region 9, San Diego, (San Diego Water Board) strongly supports Governor Newsom's Water Resilience Portfolio Initiative as articulated in Executive Order N-10-19. Indeed, in the San Diego Water Board's strategic plan, the Practical Vision¹, Chapter 5 *Strategy for Achieving a Sustainable Local Water Supply* broadly encompasses the vision and tasks set forth in the Executive Order as recently discussed with the State Water Board Member Laurel Firestone and staff at the August 14, 2019 San Diego Water Board Meeting. As we work to achieve the vision and the commitments of Executive Order N-10-19 in the face of climate change and to meet the absolute need for safe, affordable water supply, I would like to take this opportunity to encourage the State to utilize the existing Integrated Regional Water Management (IRWM) framework to support the Initiative.

The three IRWM Plans in the San Diego Region (San Diego, South Orange County and Upper Santa Margarita River) have been successfully coordinated in a three-county agreement and implemented for more than a decade. In developing and implementing our Practical Vision, the San Diego Water Board has conducted extensive water purveyor outreach since 2012 and has engaged and conferred with all three IRWM groups in the region on water supply and water quality issues and projects including climate change, wetlands protection, the Carlsbad Desalination Facility, the City of San Diego Pure Water Program, and the Tijuana River/Border Pollution problems. Statewide, the IRWM is built on an inclusive, public process that emphasizes local- and regional-scale planning, cooperative decision-making, judicious use of water resources, reducing conflict, increasing regional self-reliance, leveraging existing funds, and engaging a wide variety of stakeholders including disadvantaged and other underrepresented communities.

¹ San Diego Water Board Practical Vision https://www.waterboards.ca.gov/sandiego/water_issues/programs/practical_vision/

Ms. Vogel

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September 27, 2019

The IRWM serves as a regional forum for water resources planning, stakeholder engagement, and establishment of funding priorities. IRWM funnels millions of dollars of water bond funding to local projects throughout the state. IRWM and the Water Resilience Portfolio share similar principles of multi-benefit projects, regional solutions, innovation and new technologies, and partnerships among various stakeholders. The IRWM model has proven to be effective in regions across the state and could provide the needed structure for timely and effective outreach and funding disbursement for grants that support the Governor's Initiative.

I have personally worked with the three IRWM Regions within the San Diego Water Board's jurisdiction as a regulator, stakeholder, and funding entity. The San Diego Water Board has collaborated with these IRWM Regions on watershed/water quality improvement projects and ways to achieve better regulatory alignment in policies and projects identified in our Practical Vision. I have found these IRWM groups to be an effective regional structure for multi-benefit approaches that address water quality and water supply efforts in the face of climate change and diverse, competing priorities. The IRWM Program can be an effective vehicle for broad, community-based collaboration and cooperative decision making, regional self-reliance, technology innovation, and multi-benefit approaches and could provide the structure necessary to assist the State in implementing the Water Resilience Portfolio. If you have questions or require additional information, please contact me at David.Gibson@waterboards.ca.gov or (619) 521-3005.

Respectfully,

David W. Gibson
Executive Officer



EXHIBIT C

Letter to DWR requesting videos

Management

Roundtable of Regions

A consortium of IRWM Regions in California

October 8, 2018

Ms. Karla Nemeth, Director
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Subject: *IRWM Information Video*

Dear Director Nemeth,

The Integrated Regional Water Management Roundtable of Regions (ROR) is very interested in working with the Department of Water Resources (DWR) to develop and distribute much-needed informational video(s) focused on integrated regional water management (IRWM). The ROR consists of the IRWM practitioners and partner organizations which represent almost all of California's forty-eight IRWM regions.

Recently, DWR developed the report titled, *Stakeholder Perspectives – Recommendations for Sustaining and Strengthening Integrated Regional Water Management*. After the release of the report in March 2017 and at conferences and forums that followed, one repeated message by state officials, IRWM practitioners, and other stakeholders is the need to publicly communicate the nature, importance, and successes of IRWM. IRWM is essential for the sustainable management of water resources; however knowledge and understanding of IRWM as an important practice is often very limited among many public officials and by the public at-large. As such, one of the four overarching strategies in the IRWM Stakeholder Perspective report is to "Communicate Value." Clearly communicating the benefits of IRWM is essential to its future.

DWR is uniquely positioned and equipped to provide much-needed technical and video-production staffing in this regard. We are very impressed with your department's recent video communications, including, as just one example, the video titled "Climate Conversations." It is our concerted opinion that **an informational video, or series of videos about IRWM, is the most easily-accessible, effective, and immediate means of sharing the practice of IRWM to a broad spectrum of interests across the state.** The IRWM ROR members

understand the key role of local and regional agencies in sharing information about IRWM, but we are optimistic that video production and communication personnel in DWR's Public Affairs Office, along with DWR program staff, can work in close partnership with the IRWM ROR members to outline, script, produce, and distribute one or more informational videos on IRWM.

Key topics that should be addressed in a video include:

- What IRWM is all about and why it is so important for California.
- How IRWM is consistent with the state's Water Action Plan and Water Plan Update 2018.
- How state bond and local investments have been key to the advancement of IRWM and progress toward regional sustainability.
- What the basis and nature of California's forty-eight IRWM regions are; including how they were formed and the state acceptance process.
- How IRWM regions operate and the essential nature of their planning and implementation activities.
- What IRWM successes have been achieved so far, including individual success stories from various parts of the state.
- Why Tribal and disadvantaged community involvement in IRWM is so important, along with related successes.
- What opportunities exist for IRWM Regions and Groundwater Sustainability Agencies to work together in a coordinated and complementary manner to achieve mutually beneficial outcomes.
- Why IRWM is fundamental to the sustainable management of water resources and for meeting challenges such as climate change, aging infrastructure, and declining ecosystems.
- What actions are needed to sustain and strengthen IRWM.

The IRWM ROR members are ready to work closely together with you and your department to share information about IRWM and its importance to water management for California's future.

Thank you for considering this request. We look forward to your response. Please let us know if you have any questions, or if you would like to meet to further discuss this matter by contacting IRWM ROR Co-chair Lynn Rodriguez at Lynn.Rodriguez@ventura.org or (805) 654-2455.

Sincerely,

Lynn Rodriguez

Tracy Hemmeter

cc.

Cindy Messer
Kristopher T. Tjernell
Erin Mellon
Kamyar Guivetchi
Arthur Hinojosa



EXHIBIT D

Suggested Bond Principles

- \$1 billion in State-wide funding for IRWM be allocated IRWM Funding Areas as defined under Proposition 1 Water Bond along with funding for individual water sector needs.
- Use the 12 Funding Areas, as shown in the figure below, to apportion the funding as they largely mirror the State's ten established hydrologic regions.
 - This new investment in IRWM could also be apportioned based on multiple factors such as population by Funding Areas, area of disadvantaged communities and/or the population living in disadvantaged communities.
- IRWM regions serve as the foundation for implementing the Portfolio by taking the goals and objectives; and developing integrated and regional projects through the local collaborative networks.
- The majority of the \$1 billion be provided to competitive projects and meet the goals of long-term regional planning documents.
- Special consideration be given to projects that employ new or innovative technology or practices, including decision support tools that support the integration of multiple jurisdictions.
- IRWM funding support programs focused on education and outreach, particularly those efforts led by non-governmental organizations.
- All State Water Resource Control Board and Department of Water Resources' programs are aligned to support integrated and regional water management. These programs include California Water Plan updates, sustainable groundwater management and climate change adaptable management.

Funding Areas Used in Proposition 1

