



CITY OF STOCKTON

DEPARTMENT OF MUNICIPAL UTILITIES

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PROPOSITION 84 INTEGRATED REGIONAL WATER MANAGEMENT PROGRAM

On behalf of the City of Stockton (City), I would like to thank the Department of Water Resources (DWR) for the opportunity to participate in the recent San Joaquin County Funding Area Meeting on March 16, 2007 regarding the Proposition 84 Integrated Regional Water Management (IRWM) Program. At your request, we are providing the following comments and recommendations as DWR moves forward to develop draft guidelines for the Proposition 84 IRWM Program:

Guidelines, Standards and Criteria

At the March 16th meeting, you indicated that guidelines for the Proposition 84 Program would be developed using the Proposition 50 Guidelines as a starting point and revising those Guidelines based on feedback received from various agencies during the past several months. Like other agencies, the City recommends that any standards and criteria included in the adopted Proposition 84 IRWM Guidelines be adhered to throughout the process and not changed or altered after applications have been submitted.

In addition, DWR staff mentioned that the minimum standards for IRWM Plans requesting Proposition 84 funding would be raised from those identified in the Proposition 50 Guidelines. The City encourages DWR staff to identify and publish those standards as early as possible to provide agencies sufficient time to include any requirements in their IRWM Plans to meet these higher standards.



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Funding Awards

Questions were raised at the March 16th meeting regarding match requirements. The City feels a 25 percent local match requirement is fair to ensure local agencies are financially committed to their IRWM Plans and the proposed projects; regardless of State grant funding. In relation to local funding requirements, the City feels that consideration should be given to projects within IRWM Plans based on project readiness and a commitment by local agencies to pursue a project for its merits and benefit; not for its reliance on State funding.

In addition, DWR raised the issue of whether or not Proposition 84 IRWM awards should take into consideration previous IRWM implementation grant awards or awards made under different Chapters of Proposition 84, thus limiting the amount of funding a particular IRWM Plan could receive under Proposition 84 IRWM funding. The City is of the opinion that while consideration should not be given to funding received under different Chapters of Proposition 84 (not specifically directed at IRWM efforts), consideration should be given to those IRWM Plans that have already received more than \$10 million in IRWM implementation grant funding.

Disadvantaged Communities

Several issues were raised at the March 16th meeting by agencies unable to meet the State requirements for Disadvantaged Communities. DWR staff discussed the possibility of using regional standards for this determination. We would encourage DWR to continue to pursue of this idea which would adhere to the concept of regional effectiveness.

In summary, the City commends DWR for its efforts to maintain an open process for the development of the Proposition 84 IRWM Guidelines and hopes that our comments are helpful to you and your staff.

Should you have any questions or wish to discuss our comments further, please contact Bob Granberg at (209) 937-8779 or Melissa Price at (209) 937-8782.



MARK J. MADISON
DIRECTOR OF MUNICIPAL UTILITIES

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