# Providing Landowner Incentives to encourage Riparian Restoration and Natural River Processes on Working Landscapes.

**Burton M Bundy** 

#### **Initial Selection Panel Review**

0040

Providing Landowner Incentives to encourage Riparian Restoration and Natural River Processes on Working Landscapes.

CSU, Chico Research Foundation

Applicant amount requested: \$2,148,602

Fund This Amount: \$600,000

The selection panel will reconsider this proposal if revised. The panel indicated that the numerous components of the project aren't necessarily integrated. There was insufficient detail in the budget. Additionally, the applicant may not have strong support from certain segments of the landowner community.

The panel recommends funding only the tasks related to safe harbor and basic landowner conservation assistance for \$600,000. The revisions to the proposal should focus on the development of a safe harbor agreement, demonstrating better integration with the USFWS process. The proposal should be clear on its commitment to provide a state ESA safe harbor agreement under applicable provisions of the Fish &Game code. The proposal should also focus on basic landowner assistance, including permit assistance, the conservation assistance library publication, and related landowner workshops and conservation tools. The applicant should provide a revised budget that includes a more detailed breakdown of costs and provide a response to the concerns about landowner support raised in a regional review.

Reconsider if Revised

#### **Technical Panel Review**

**Proposal Name:** Providing Landowner Incentives to encourage Riparian Restoration and Natural River Processes on Working Landscapes.

Applicant Organization: CSU, Chico Research Foundation

**Amount Requested:** \$2,148,602

Panel Rating:

Poor - Serious deficiencies.

#### **Panel Summary**

The panel had significant concerns about the budget, scope and potential applications of the proposal. While the stated goals are extremely desirable, the approach for obtaining safe harbor agreements in this proposal was not considered by the panel to be the most desirable approach. The proposal is unfocused and lacks sufficient detail on its proposed activities, and sufficient detail on those activities. For example, the invasive species management component was poorly designed and explained.

In addition, the project does not adequately emphasize monitoring to establish baseline conditions followed by a post-monitoring program once an agreement is in place. The budget seemed unjustifiably large and the objectives were redundant with ongoing work to develop safe harbor agreements that are already being implemented in the region. Safe harbor agreements are available through coordination with the FWS at no cost.

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#### Goals

### Rating very good

Comments The problem is well articulated. As a programmatic level proposal, the goals, objectives, and means to achieve are not highly detailed, but appear comprehensive (include both ecosystem and agricultural goals and objectives and links to ERP objectives) and well thought out. Major program components are identified, but it is unknown to what extent putting the proposed program into action will ultimately benefit habitats and species. Much is assumed for future participation of landowners, and funding for site specific conservation projects is not part of the present proposal and funding request. Although future on-the-ground benefits for farmers and fish and wildlife are speculative and not measurable, the stated need for programmatic level planning has merit. Completing the tasks and deliverables, as stated, would provide a needed foundation for future participation of landowners in implementing conservation-oriented land use practices and resolving species-land use issues in the SRCA.

> The proposal does not strongly address some priorities identified in the proposal solicitation package, primarily those involving implementation of projects on the ground. The proposal is weak in identifying

relative effectiveness of conservation-based farming practices, implementing agricultural activities that benefit MSCS species, implementing projects to benefit giant garter snakes or assess water management, and implementing projects that protect farmland and MSCS-covered species. The proposal is strong in developing a process to develop and implement conservation activities, facilitating permits and regulatory assurances that benefit MSCS species, and developing a process to protect farms and MSCS species.

The focus is on riparian and stream channel habitats. As a programmatic level proposal, relative benefits among MSCS species are not clearly identified. Although specific land management practices are not emphasized, actions to protect, restore, or enhance riparian and associated habitat would be facilitated in the future. This would benefit MSCS species using riparian habitat, or species, such as giant garter snake, using riparian edges or adjacent habitats.

#### **Justification And Conceptual Model**

# Comments Because of the programmatic nature of the proposal, the conceptual models are administratively-based rather than ecologically-based. However, the models present program management processes fairly clearly. Although most pertinent elements appear present in Figure 1, the model could separate implementation of conservation actions from biological results in separate boxes. Since biological results are indicated, an element for adaptive management of conservation actions would be useful. In Figure 2, it is not clear what self mitigation means or how it relates to regulatory permits. I did not see reference to this in the proposal.

#0040: Providing Landowner Incentives to encourage Riparian Restoration and N...

Proposed actions in the proposal are justified and supported by the model, including pilot projects for

invasive species removal and conservation banking. However, I do have a concern about financing mitigation and conservation banking relative to biological benefits, which is further mentioned in comments for "Approach."

#### Approach

#### **Rating**

very good

Comments Proposed tasks, methods, and deliverables generally appear appropriate for addressing the stated problems and meeting project goals. Completing the tasks and deliverables, as stated, would likely produce a good foundation for future participation of landowners in implementing conservation-oriented land use practices and resolving species-land use issues. Resulting programs, reports, data, and GIS analyses would help inform and facilitate future conservation projects.

> Although deliverables for subtask 2.3 includes final biological opinions and a regulatory assurances agreement, these products are developed or approved by the agencies and are not true products to be delivered by the grant applicants. A proposed agreement and data necessary to complete the biological opinions may be better deliverables.

The main biological experiment in the proposal is removal of invasive plant species in a demonstration project. Although the intent and some methods are stated, no expected outcome (hypothesis) or performance measures are provided. A report is not indicated as a deliverable, and the work ends with a plan for revegetation, but no actual revegetation work. A complete demonstration project would include revegetation with native species, monitoring, and performance measures to achieve, plus a conceptual model and hypothesis test.

Approach to mitigation and conservation banking under subtask 3.3 is somewhat vague regarding how future

banks would be financed and operated. Would public funding be requested for habitat restoration in banks to increase habitat/species values, and would credits be sold for mitigation/conservation needs outside of the SRCA? What entities are the envisioned bank customers?

Subtask 3.4 refers to implementing ecosystem restoration compatible with agricultural activities and visa versa, but no examples or range of potential activities are provided.

Subtask 3.5 for investigating new incentive opportunities identifies only continued advocacy as a deliverable. Perhaps reports could be provided on this task's progress and outcome.

#### **Feasibility**

#### Rating good

Comments The proposal's approach appears technically feasible. Most of the work involves interaction with a public that is skeptical and wary of species and habitat conservation. It would be important for grant applicants to establish tactful, trusting relationships with landowners, strong landowner participation, and robust conservation assistance tools, because future participation by landowners and achievement of biological benefits would be the payoff for investing in the programmatic groundwork identified in the proposal.

> Because the proposed actions would result in little actual conservation on the ground and future funded work would be required to achieve a species-habitat payoff, additional information by the applicant on plans for future implementation of project, potential funding sources, and potential for future biological results would be useful for this proposal.

With dedicated implementation, the likelihood of success should be high. Requirements and process for achieving desired results are well addressed. Contingencies for dealing with unexpected difficulties are not identified.

#### **Performance Evalutation**

Rating	fair
	As a largely programmatic planning and public outreach proposal, the proposal includes little performance evaluation or monitoring to track program success. Reports are not always offered as deliverables for tasks/subtasks where reports would be warranted. The main restoration action in the proposal is removal of invasive plant species in a demonstration project. No report is indicated for this task, and work ends only with a plan for revegetation. This activity should include revegetation, monitoring, and performance measures with specified achievement requirements.
	Because of uncertainties in working with the public on potentially contentious issues, the significant monetary investment, and reliance on additional future actions for obtaining species and habitat benefits on the ground, it would be prudent for CALFED to carefully monitor this program, if funded, to ensure adequate progress is being made. This could be done through general progress reporting by the applicants using documents or presentations.

#### **Proposed Outcomes**

Rating	good
	Completing the tasks and deliverables, as stated, would lay a good foundation for future participation of landowners in implementing conservation-oriented land use practices and resolving species-land use issues in the SRCA. Actual contribution to ecosystem health is not quantified or well qualified, would

occur in the undefined future, and would depend on a sufficient number of projects being funded and implemented through other means than the present proposal.

Successful implementation of proposed actions would provide a model for achieving similar goals in other locations. Documentation of successes and failures along the way would be important to inform application of this approach elsewhere.

Availability of specific data produced is not always clear (e.g., aerial photos, GIS layers, and listed species surveys). Some of this information would be sensitive, but in the least, all data should be made available to the ERP implementing agencies. It should be required that detailed metadata be provided for all GIS coverages and other applicable forms of data. Data that is not sensitive and pertinent reports should be made available to the public, as appropriate.

#### **Capabilities**

Rating	good
Comments	I have little personal knowledge of the track record of the project team. In reviewing the credentials provided in the proposal, the project team and university appear to be well suited for the tasks at hand.

#### **Cost-Benefits**

Rating	good
	Budget appears reasonable and adequate for work proposed.
	Adequate reporting and documentation of successes and failures along the way and full provision of project data would be important to maximize CALFED's effectiveness of funds

# granted. Overall Evaluation Summary Rating

Rating	very good
Comments	Although the proposal does not emphasize conservation work on the ground, the intent of proposed actions has merit. Completing the proposed work would provide a needed foundation for future participation of landowners in implementing conservation-oriented land use practices and resolving species-land use issues in the SRCA. Deficiencies identified in this review are minor and should not detract from the proposal's positive aspects, or can be easily supplemented with additional commitments by grant applicants. Tracking project progress by the ERP to ensure project success would be important.

**Proposal Number:** 0040

**Proposal Name:** Providing Landowner Incentives to encourage Riparian Restoration and

Natural River Processes on Working Landscapes.

Applicant Organization: CSU, Chico Research Foundation

**Amount Requested:** \$2,148,602

#### **Goals**

Rating	good
Comments	The project does address ERP goals and those of conservation and agriculture. It is not clear whether the first objective is the overall objective and the other two are subordinate or if all three carry similar weight, so the tangibility is hard to grasp.

#### **Justification And Conceptual Model**

Rating	good
	The conceptual model clearly shows how different aspects of the project relate to one another, and the hypotheses it is testing. It is not clear why demonstration project was chosen over pilot project.

#### **Approach**

Rating	good
	Methods for project management and the first two subtasks of regulatory task are appropriate and clear, but not sure how easy it will be to deliver the next subtask of regulatory assurances and hence those subtasks below that. The outreach and education with assisting landowners with conservation programs is clear. Approach for management and regulatory tasks

are probably dependent on people and personalities involved and may have limited transferability to other agencies and NGOs.

#### **Feasibility**

Rating	fair
Comments	The project assumes Safe Harbor or similar assurance agreements will be successfully made available for many protected species, but this may take more time than the three years of the project.

#### **Performance Evalutation**

Rating	good
	It is not clear how the landowner surveys will be conducted (in-person, phone or mail?) in order to obtain information from the large number (600) growers. Tying this information to the project tracking system would help to see behavior changes over the riverine landscape. There is no mention of monitoring invasive species project.

#### **Proposed Outcomes**

Rating	very good
Comments	If project is successful, it can be used to benefit many conservationists and landowners throughout the Central Valley. The unified database is a valuable tool that can hopefully be shared in-confidence with other conservationists working along the river.

#### **Capabilities**

Rating	very	very good								
Comments	The	TAC	and				conservation	expertise	and	

#### **Cost-Benefits**

Rating	fair							
Comments	Project budget proposed.	seems	high	for	the	amount	of	work

#### **Overall Evaluation Summary Rating**

Rating	good
Comments	While the project does address the problem of encouraging and motivating farmers to practice good stewardship and implement restoration projects, it overly focuses on regulatory assurances that may be hard to achieve. There are other key conservation roadblocks farmers have that need focusing on, such as helping them overcome their resistance to change, and giving financial assistance. Farmers are can be

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#### **Goals**

Rating	very good
Comments	The general goal of this proposal is to provide incentives and support to private landowners that restore habitat on their land along the Sacramento River. Private landowners are a critical component for the potential long-term goal of a continuous habitat corridor to be achieved (as stated on page 3). These goals are in general agreement with the ERP.  The specific objectives of the project are fourfold:  1) general coordination and technical support of conservation efforts through the Sacramento River

#### **Justification And Conceptual Model**

Rating	fair
Comments	The conceptual model for the project is outlined in Figures 1 and 2. However, there is no description of what this model really means. For example, in Figure 1, the green boxes indicate components of the current proposal. Are the other components already funded and operative? Some of these are critically important, such as outreach, for this project's success, but it is not clear if such activities are already in place. Figure 2 is even more difficult to truly understand what it means or if it is useful. What specifically is Figure 1 telling us about the conceptual plan for the project and how does it differ from Figure 1? For example, what do transparency and accountability refer to? Landowners? How does it really relate to natural processes? Likewise, how does local technical capacity relate to natural processes? What does the blue box really mean? It contains many different ideas. Figure 2 does not really speak to any objectives or hypotheses being tested. Figure 1 does contain some of the objectives, but it does not really show how these are integrated within this proposal (it only shows how they fit into the bigger picture).  With that said, the investigators generally do a good job with justifying why the assurances objective is important (my objective 2 above; Task 2 in the approach), but it could better justify the pilot and demonstration projects. For example, what exactly will the pilot projects regarding conservation banking contribute to better integration of farmers/landowners

#### Approach

Rating	fair						
Comments	Much	of	the	approach	centers	around	the

assurances objective. Some of the proposed work is clear. For example, the outreach in Subtask 2.4 is strong, clear, and important. However, other aspects are either vague or not justified, making it difficult to interpret what the approach will attain. For example, the GIS mapping for Subtask 2.1 and is not justified. Why is this classification being completed? I assume it will be used in Subtask 2.2 to determine restoration needs of target species. How will restoration needs be determined for each species? What does Net Conservation Benefit really mean when developing these needs? This appears to be an extremely critical part of the proposal, and yet it is relegated to 2 sentences.

In particular, it is critically important to evaluate the specific mechanism by which 'incidental take' is allowed; however, this is not detailed in the proposal. There are many issues that come to mind in such allowances. For example, in the 'Goals and Objectives' section, the investigators mention that incidental take would be allowed when a "species attracted to, or produced on, their property as a result of beneficial habitat management and /or restoration". But, how will we really know if a species colonizes an area because of beneficial management, or just simply through natural variation in metapopulation dynamics occurring? Also, couldn't landowners destroy or degrade habitat before signing the "Certificate of Inclusion" to thereby allow for little, if any, responsibility for future land enhancement? If this indeed happened, I do not think it would be much of an

improvement over some the issues addressed in the Introduction.

Finally, in Task 2, it is unclear how monitoring will occur to estimate baseline conditions, yet this is obviously quite important. For example, how long will monitoring occur? One day? One week? One year? Does it depend on the species? I hope so. Some species show much variation in occupancy, such that it could occur in an area on one day, but not another. How intensive will the monitoring be? Could it be biased? Unfortunately, none of the methods are described. All that is mentioned is that 'agency approved survey protocols' will be used.

In Task 3, the investigators will initiate a series of demonstration and pilot projects. The demonstration project will consist of invasive plant species removal, comparing two techniques: goats and chemicals. However, the proposal does not describe how these methods will be used (e.g., Will there be any controls? How many goats will be used? What kinds of chemicals? For how long?). Furthermore, how can you know that "complete removal of invasive plant species" will occur? Because of this lack of detail, it is difficult to know exactly what this demonstration project will really demonstrate. The conservation/mitigation banking pilots are also not clearly described. While banking obviously provides benefits to landowners, it would be useful to assess if banking really works. For example, mitigation work on wetlands has historically resulted in new wetlands of very low quality.

In summary, the approach is clear for some portions of the project, but vague in other important areas, making it difficult to interpret the value of information that will result from the proposed project for farmers and managers.

#### Feasibility

Rating	very good
	Based on the capabilities of the investigators and the fact that much of the logistical organization is already in place, overall, successful implementation of this project is likely. The SRCAF has ongoing partnerships with many agencies and landowners, which will be critical for proper implementation. While much of the approach was not detailed thoroughly, the general approach is certainly feasible. My only concern is that 3 years will simply not be long enough for assurances to make a difference in this system. By the time the details are worked out, landowners will probably only have 1-2 years to enroll. This is not a fatal flaw, however, and the investigators do have a long-term vision for attaining the general goals of the project.

#### **Performance Evalutation**

Rating	good
	The main aspect of the project related to performance evaluation is a series of landowner surveys that will assess landowner attitudes towards restoration and conservation and how attitudes change with the implementation of the program. It appears that these surveys will be intensive, whereby the investigators will attempt to survey all farmers in the region. This performance evaluation will provide detailed and useful information regarding project performance from

the landowner standpoint, which makes this aspect of the performance evaluation very good to excellent. However, there is no mention of measuring project effectiveness from other perspectives, such as manager/conservationist viewpoints or how effective the project is from an ecosystem point of view. Such perspectives will be critical for truly interpreting the effectiveness of this project in integrating farmer and ecosystem issues.

#### **Proposed Outcomes**

Rating	good
Comments	Some of the proposed outcomes, such as approaches to develop assurances to reduce disincentives of conservation practices, should be widely applicable to other ecosystems and other areas. Results from the demonstration project may also be applicable to other riparian systems. The investigators mention that the project should result in research publications, but it is hard to see where potential publications would arise (in part, because the investigators are vague about much of the approach).

#### **Capabilities**

Rating	very good
Comments	The investigators are generally well qualified to carry out the project, and they are subcontracting with appropriate agencies for various aspects of the proposal. They have also received a variety of grants from CALFED previously. However, there was no real resume for the Principal Investigator, limiting the amount of detail regarding his experience.

#### **Cost-Benefits**

Rating	good
Comments	This is an ambitious project that will cost approximately 2.1 million. The investigators will do a variety projects within their general goals. Task 2 seems a bit expensive for the product outcome. For example, \$273,000 will be spent on GIS mapping, but it was not justified in the proposal how mapping will be used and how it will benefit the goals of the project. However, Task 3 seems inexpensive for the demonstration and pilot projects.

#### **Overall Evaluation Summary Rating**

Rating	good
Comments	The project could easily be seen as three separate sub-projects: one on developing assurances for landowners, particularly 'incidental take', one demonstration project on invasive species removal, and a pilot project on conservation banking. The goals for each aspect of the project are strong. However, this proposal is weakened by trying to do too much. Because of the amount of work proposed, many sections are very vague, making it difficult to interpret what the outcomes of the project will really be. For example, it is not until p. 17, after the approach is outlined, that the investigators mention all the work that will be completed specifically on Giant Garter Snakes. Furthermore, this proposal is rich with jargon and acronyms, some of which are never explained or defined. Together, these issues make the project appear to be less strong than it may actually be.

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1. Applicability to ERP goals and regional priorities.

The Sacramento River Conservation Area Forum strives for protection and restoration of the Sacramento River meander corridor and, through this collaborative program, ensures that CALFED ERP goals and priorities will be addressed. This proposal specifically deals with the issues that revolve around integrating agricultural activities and ecosystem restoration in the landscape of an alluvial river. project activities that will help "understand the relative effectiveness of different conservation based farming practices and systems, and their contribution to larger restoration efforts". provide both assurances and incentives that encourage farmers to "develop and implement agricultural activities that benefit MSCS-covered species". The Burroughs property pilot project is in an area of giant garter snake habitat, and qualifies as a, "pilot scale implementation and research project that conserves giant garter snakes --".

notes:

The proposed activites aim to simultaneously address the concerns of landowners and restore habitat.

2. Links with other restoration actions.

The proposed project continues and expands on past and current restoration investments in the region. The project could be

used as a model for future restoration actions in the area.

Pilot Projects--Mitigation Banking is an incentive program that can provide additional income on agricultural property. Conservation Banking allows preservation credits as well as restoration credits. Three specific sites have been identified that would warrant investigation and possible development as mitigation and/or conservation banks: Haws property, Burroughs Ranch, and The Nature Conservancy property.

notes:

The project builds on previous years of work on a Good Neighbor Policy with regional farmers. The project aims to help land owners tap into funds to implement restoration on their properties while developing safe harbor agreements.

#### 3. Local circumstances.

Given the PI's past experience with this type of work and in this geographic location, they should be able to complete the project. The scope of work and task schedule outline an ability to complete this work within three years. there are no obvious local constraints on the project's ability to move forward in a timly and successful manner.

notes:

Some members of the panel question the ability of SRCAF to accomplish a suite of relatively broad objectives.

#### 4. Local involvement.

The Mission Statement for the Sacramento River Conservation Area Forum (SRCAF) is to "bring communities, individuals,

organizations, and agencies together along the Sacramento River to make resource management and restoration efforts more effective and sensitive to the needs of local communities." The SRCAF will work with Sustainable Conservation and local RCDs to provide newsletters and public information to our extensive local mailing list and offer workshops and presentations to those interested. At least three workshops will be coordinated in conjunction with local RCDs, to address any specific concerns or issues related to the different reaches of the conservation Area. Newsletters will be sent to more than 800 landowners within the Conservation Area, and press releases will be sent to media representatives, Farm Bureaus, and RCDs in all affected counties.

notes:

The proposed work strives to close the gap between landowners and regulatory agencies and to develop safe harbor agreements which are considered very important. However, the linkages between landowners and the proposal are debatable. One reviewer noted that local farm bureaus did not respond to requests for support for this proposal and support from other organizations is also questionable.

#### 5. Local value.

The project will encourage landowner participation in restoring ecosystems in the region. The project will improve riverine habitat that supports salmon, and steelhead and riparian habitat that provides habitat for 250 species of mammals, amphibians, reptiles, and birds including,65 species of special concern(status unknown or precarious) and 33 threatened, and endangered species.

notes:

The panel questions the allotment of funds within the proposal and the use of requested funds to accomplish stated PSP objectives.

#### 6. Applicant history.

The applicant has performed well on previous projects. One panel member noted that the current staff of SRCAF does not enjoy the support of participating farmers and other agencies.

notes:

It is understood that both CSU Chico, which is administering the project, and SRCAF, the agency responsible for implementing the proposal, have performed well in previous projects.

#### 7. Summary of Overall Panel Discussion and Review

The panel feels that there is a lack of specified deliverables in the proposal. Some panel members question the capacity of SRCAF to accomplish stated objectives without additional expertise on board. At least one panel member has significant concerns about the proposal as a whole, and serious concerns about the ability of the proposers to accomplish goals stated in the proposal. One reviewer stated in the secondary review: "The methods proposed and the several layers of staff and administration lead to my conclusion that this project does not adequately include the necessary professional and scientific personnel or consultants to achieve its goals and deliverables."

This proposal is viewed as an attempt of SRCAF to step up previous work and meet previous objectives.

#### 8. Panel Quality Ranking

9. Regional Priority Ranking

High notes:

Good notes:

#### **Environmental Compliance Review**

Proposal Number: 0040

**Proposal Name:** Providing Landowner Incentives to encourage Riparian Restoration and Natural River Processes on Working Landscapes.

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1. Is compliance with California Environmental Quality Act (CEQA) required for this project?

Yes.

- 2. Is compliance with National Environmental Policy Act (NEPA) required for this project? **Yes.**
- 3. Does this project qualify for an Exemption or Exclusion under CEQA and NEPA, respectively?

No.

#### Comments

It is possible that NEPA is Categorically Excluded but the applicant will work with USFWS to determine the appropriate NEPA doc.

- 4. Did the applicant correctly identify if CEQA/NEPA compliance was required? **Yes.**
- 5. Did the applicant correctly identify the correct CEQA/NEPA document required for the project?

Yes.

#### Comments:

Not really clear. The applicant checked "EIR" under CEQA compliance but then stated that CEQA compliance may not be necessary if they obtain a Consistency Determination. Appropriate CEQA/NEPA (see above) compliance will be determined by lead agencies.

#### **Environmental Compliance Review**

- 6. Has the CEQA/NEPA document been completed? **No.**
- 7. If the document has not been completed, did the applicant allot enough time to complete the document before the project start date?

  Yes.
- 8. If the document has not been completed, did the applicant allot enough funds to complete it?

Yes.

9. Did the applicant adequately identify other legal or regulatory compliance issues (Incidental Take permits, Scientific Collecting permits, etc.) that may affect the project? **Yes.** 

#### Comments:

They did not check "CWA 404" on the application but indicated on page 11 of the main text that they would seek a Regional General Permit from Army Corp.

They checked both "2081" and "NCCP" on the application. They only need one of these, not both. In this case, a 2081 seems likely.

- 10. Does the proposal include written permission from the owners of any private property on which project activities are proposed or, if specific locations for project activities are not yet determined, is it likely that permission for access can be obtained?

  Yes.
- 11. Do any of these issues affect the project's feasibility due to significant deficiencies in planning and/or budgeting for legal and regulatory compliance or access to property?

#### **Budget Review**

Proposal Number: 0040

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1. Does the proposal include a detailed budget for each year of the requested support?

#### Yes.

2. Does the Budget Form include a detailed budget for each task identified on the Task and Deliverables Form and in the proposal text?

#### Yes.

3. Are the costs associated with each task and deliverable reasonable costs for performing the services?

#### No.

If no, please explain:

Difficult to determine. Recommend detail budget for non-state for subcontractors in Task 2 (particularly non-state agencies).

4. Is each person (employee, consultant, subcontractor, etc.) identified on the Personnel Form also included on the Budget Form?

#### Yes.

If no, please explain:

Recommend indicating classification/title of each employee.

5. Are there estimated hours and an associated hourly rate of compensation for each person identified on the Personnel, Tasks and Deliverables, and Budget forms?

#### Yes.

#### **Budget Review**

6. Does the budget include the benefit rate for all personnel identified on the Personnel and Budget forms?

#### Yes.

If no, please explain:

Benefits rate is slightly higher than standard 41%.

7. Are the proposed labor rates comparable to state rates?

#### Yes.

If no, please explain:

Recommend labor rates from Subcontractors (for profit entities)

8. Is more than 25% of the work proposed to be performed by subcontractors?

#### Yes.

If yes, what is the exact percentage to be performed by subcontractors?

60% of the proposed tasks will be subcontracted by various entities.

9. Are project management expenses appropriately budgeted?

#### Yes.

10. Does the proposal clearly state the type of expenses encompassed in indirect rates or overhead costs? Are indirect rates, if used, appropriately applied?

#### No.

If no, please explain:

No detail was provided. However, Indirect cost rate appears to be reasonable (20%)

11. Does the proposal adequately explain major expenses? Are the labor rates and other charges proposed reasonable in relation to current state rates?

#### Yes.

#### **Budget Review**

12. For equipment >=\$5,000, was a separate worksheet filled out? Please note: No overhead or indirect rate charges are allowed on the equipment purchases

#### Yes.

13. Is the purpose for all travel clearly represented in either the proposal itself, or in the Tasks and Deliverable Form?

Please note: Recurring travel costs for a specific task or subtask may be combined into one entry on the Budget Form, but the number of trips and cost for each trip must be clearly represented.

#### No.

14. Are travel and per diem at <u>rates specified by the California Department of Personnel Administration</u> for similar employees?

#### Yes.

15. Are other agencies contributing or likely to contribute a share of the projects? costs?

#### Yes.

16. If the applicant identified cost share or matching funds, are they also described in the text of the proposal?

#### Yes.

17. Does the applicant take exception to the standard grant agreement's terms and conditions? If yes, are the approaches the applicant proposes to address these issues a reasonable starting point for negotiation a grant agreement?

#### Yes.

If no, please explain:

#### Several Exceptions indicated to Exhibit B.

18. Are there other budget issues or "red flags" that warrant consideration?

#### No.

19. Provide revised amount requested based upon your review:

\$

Other comments:

Complete budget narrative was not provided.