



SAN DIEGO
Integrated Regional
Water Management

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Tracie Billington
Department of Water Resources
P.O. Box 942836, Sacramento, CA 94236-0001

Scott Couch
State Water Resources Control Board
1001 I St., 17th Floor
P.O. Box 944212
Sacramento, CA 95814

Dear Ms. Billington and Mr. Couch:

Three agencies – the San Diego County Water Authority, the County of San Diego, and the City of San Diego – signed an MOU in 2005 forming the Regional Water Management Group (RWMG) for the San Diego region. This group was established to work with governmental and non-governmental stakeholders throughout the region to develop the first-ever San Diego Integrated Regional Water Management (IRWM) Plan, and to submit a Proposition 50 IRWM grant application.

We have made significant progress in our IRWM planning process and are pleased to have been invited back to submit the Step 2 application. After carefully reviewing the Step 2 Proposal Solicitation Package (PSP) and the comments received on our Region's Step 1 application (PIN 10768), we have developed the following specific comments for your consideration.

Schedule

The Step 2 application is currently scheduled to be due on January 15, 2007. The RWMG requests that the State Water Resources Control Board and Department of Water Resources consider extending this deadline, as it will be exceedingly difficult for applicants to meet this timeline. As you will recall, Governor Arnold Schwarzenegger declared the County of San Diego to be in a State of Emergency on October 21, 2007 due to the devastating firestorm that burned 350,000 acres of the County. Extending the submittal deadline would assist affected communities in recovering from the devastating fires prior to redirecting resources to prepare the Step 2 application. An extension of one month would be greatly appreciated. The RWMG will

be submitting a letter to Director Lester A. Snow of the Department of Water Resources and Executive Director Dorothy Rice of the State Water Resources Control Board to this effect.

Question #3: Adopted Plan

The San Diego IRWM application received 1 point out of a possible 5 points. The review comments state: "The Public Review Draft IRWMP was accepted by the San Diego County Water Authority on July 26, 2007 prior to the application for Step 2. However, a score of 5 is not granted because applicant has submitted a Draft IRWMP. There are incomplete sections/targets noted within the Plan."

The Proposition 50 Chapter 8 Integrated Regional Water Management Grant Program Guidelines, Proposal Solicitation Packages, Round 2, dated June, 2007 (Guidelines), defines "Adopted IRWM Plan" as follows (page 65):

Adopted IRWM Plan – means an Integrated Regional Water Management Plan that has been formally accepted, as evidenced by a resolution or other written documentation, by:

- The governing body of the regional agency authorized to develop the Plan and has responsibility for implementation of the Plan; or
- The governing bodies of the agencies and organizations that participated in the development of the Plan and have responsibility for implementation of the Plan.

This definition does not specify that a plan must be labeled "final," nor does it state that the IRWM Plan title cannot include the word "draft." If the distinction between draft and final is intended to be used to determine whether a plan has been adopted, this terminology should be added to the Guidelines. Further, the presence of incomplete sections/targets within the Plan is in no way related to Plan adoption. The SD IRWM Plan meets the definition of an "Adopted IRWM Plan" as established by the guidelines. As such, the RWMG requests that the San Diego Step 1 application receive 5 points for fully addressing this criterion.

Question #5: Objectives

The San Diego IRWM application received 4 points out of a possible 5 points. The review comments state: "Criterion is addressed but is not supported by thorough documentation or sufficient rationale. The Draft IRWMP describes four goals and nine objectives and the public process followed to derive them. The objectives include a detailed determination and rationale and realistic, achievable, and often quantifiable planning targets for each. However, in some places, placeholders are present indicating the draft status of the IRWMP (p C-8, 11, 13 & 14). The Draft IRWMP lacks detail regarding conflict resolution. There is an exhaustive list of potential conflicts, but the referenced text in Section N provides little additional discussion on this point."

The above-referenced Guidelines present the scoring criteria for the Objectives section as follows:

- Did the Plan identify regional planning objectives and the manner in which they were determined?
- Does the Plan address major water related objectives and conflicts in the region covered by the Plan?

As identified in the review comments, the San Diego IRWM Plan “describes four goals and nine objectives and the public process followed to derive them. The objectives include a detailed determination and rationale....” In this way, the San Diego IRWM Plan fully addresses question number one. Further, the review comments state that the San Diego IRWM Plan provides “...an exhaustive list of potential conflicts...” In this way, the IRWM Plan fully addresses the second criterion. While the reviewer notes that the IRWM Plan includes placeholders for some of the quantifiable targets, quantifiable targets are not part of the IRWM Plan standards and are not identified as a basis for scoring. Therefore, the RWMG requests that the San Diego Step 1 application receive 5 points for fully addressing this criterion.

Question #8: Implementation

The San Diego IRWM application received 4 points out of a possible 5 points. The review comments state: “Criterion is addressed but it is not supported by thorough documentation. The Draft IRWMP outlines specific actions, both ongoing and planned that will be employed in implementation of seven designated short-term priorities. It includes a table showing timelines for active and planned projects. A table is provided showing the agencies responsible for project implementation. A brief discussion on linkages and interdependence is presented for a few projects. The economic feasibility of projects is addressed, but the technical feasibility is not well documented.”

Technical Feasibility of projects is addressed by the IRWM Plan to the same degree as economic feasibility. Technical feasibility is discussed at a programmatic level in Section I, and the technical feasibility of each project included in the Plan is discussed in Appendix 10. Therefore, the RWMG requests that the San Diego Step 1 application receive 5 points for fully addressing this criterion.

Question #9: Impacts and Benefits

The San Diego IRWM application received 4 points out of a possible 5 points. The review comments state: “The criterion is addressed but is not supported by thorough documentation. The Draft IRMWP presents a good discussion on potential regional benefits derivable from implementation. The potential short and long-term impacts are discussed and presented in a summary table. Inter-regional benefits are outlined and a strong case is made for regional solutions as opposed to individual efforts. A list of projects identified as providing direct general benefits to DACs is provided. Benefits and impacts to other resources are addressed. However, the negative impacts to adjacent regions due to plan implementation can not be located, and there is no discussion addressing the exclusion of the Upper Santa Margarita watershed.”

The Guidelines present the basis for scoring the Impacts and Benefits section as follows:

- Does the Plan include an evaluation of potential negative impacts within the region and in adjacent areas from its implementation?
- Does the Plan include the advantages of the regional plan as opposed to individual local efforts?
- If applicable, does the Plan identify interregional benefits and impacts?
- If applicable, did the applicant describe the benefits to disadvantaged communities?

- Was an evaluation of impacts/benefits to other resources provided?

The San Diego IRWM Plan fully addresses each of the scoring criteria above, including interregional benefits and impacts. Specifically, inter-regional benefits and impacts – including anticipated benefits and impacts to adjacent Riverside County – are presented on page H-11. The scoring guidelines for Impacts and Benefits do not include criteria associated with defining the regional boundaries. Consistent with the IRWM Guidelines, the San Diego IRWM Plan discusses the regional boundaries and the rationale for excluding the Upper Santa Margarita watershed in Section B Region Description (page B-3). No attempt was made to justify this division in the Impacts and Benefits section, as this would be inconsistent with the Guidelines. All of the published Impacts and Benefits scoring criteria were fully addressed by the San Diego IRWM Plan. As such, the RWMG requests that the San Diego Step 1 application receive 5 points for fully addressing this criterion.

Question #14: Stakeholder Involvement

The San Diego IRWM application received 4 points out of a possible 5 points. The review comments state: “Criterion is fully addressed but is not supported by thorough documentation or rationale. The Draft IRWMP demonstrates extensive outreach including an annual Project Clean Water (PCW) Summit to present the IRWM planning process and invite public participation. Mechanisms to facilitate stakeholder involvement are addressed and thus far seem successful. The PCW website makes the IRWM documents available for public use. PCW workgroups have involved over 830 stakeholders and have been a source of information and means for stakeholders to influence the decisions of the IRWM program. Obstacles are identified. Coordination with State and federal agencies is discussed. DACs and Environmental Justice issues are addressed in several sections of the Draft IRWMP. However, the DAC participation in the planning process was limited to two out of the nine communities identified in the Draft IRWMP.”

The Guidelines present the basis for scoring the Stakeholder Involvement & Coordination section as follows:

- Does the Plan identify stakeholders and the process used for inclusion of stakeholders in development of the plan?
- Does the process include a discussion of how:
 - Stakeholders are identified,
 - They participate in planning and implementation efforts, and
 - They can influence decisions made regarding water management?
- Did the Plan document public outreach activities specific to individual stakeholder groups?
- Does the Plan include a discussion of mechanisms and processes that have been or will be used to facilitate stakeholder involvement and communication during plan implementation?
- Are partnerships developed during the planning process discussed?
- Did the application discuss environmental justice concerns?
- Did the application discuss disadvantaged communities within the region and their involvement in the planning process?

- Were any possible obstacles to Plan implementation identified?
- Was coordination with State or federal agencies discussed?
- Did the Plan identify areas where a State agency or agencies may be able to assist in communication or cooperation, or implementation of plan components or processes, or identify any state or federal regulatory actions required for implementation?

The Guidelines for assessing DAC participation require the application to “discuss disadvantaged communities within the region and their involvement in the planning process.” In no place do the scoring criteria indicate that scoring will be based on the percentage of DAC communities participating in the effort. As such, this should not be used as a basis for evaluation. Further, the San Diego IRWM Plan identifies two participants in the Regional Advisory Committee who directly or indirectly represent DACs throughout the Region. As a result, DACs throughout the Region are represented. Because the San Diego IRWM Plan fully addresses all scoring criteria associated with Stakeholder Involvement & Coordination, the RWMG requests that the San Diego Step 1 application receive 5 points for fully addressing this criterion.

Question #15: Disadvantaged Communities – Environmental Justice

The San Diego IRWM application received 6 points out of a possible 10 points. The review comments state: “Criterion is addressed but it is not supported by thorough documentation or sufficient rationale. The Draft IRWMP includes several specific actions to identify DACs and include them in the IRWM planning and implementation processes. The DACs are identified and listed in a table. However, the Draft IRWMP does not explicitly state the critical water related needs of the DACs, but rather provides statements regarding how they will generally benefit and how they will be brought into the IRWM process more fully. Environmental Justice concerns are not identified and the Draft IRWMP states that these concerns will be identified at a later date as part of the public outreach efforts.”

The Guidelines present the basis for scoring the Disadvantaged Communities – Environmental Justice section as follows:

- Did the Plan identify the disadvantaged communities in the Region?
- Did the Plan discuss the specific critical water-related needs of disadvantaged communities?
- Did the Plan discuss the mechanisms used in development of the Plan to ensure participation of disadvantaged communities?
- Did the Plan identify the water-related Environmental Justice concerns for the Region?
- Did the Plan discuss the mechanisms used in development of the Plan to ensure that implementation of the Plan addresses Environmental Justice concerns?

While the San Diego IRWM Plan includes a Public Outreach Plan that identifies specific actions to be taken to further expand DAC and EJ involvement in IRWM planning and implementation, it also provides discussion of actions that were taken throughout the planning process to this end. The Plan clearly identifies and provides a map of disadvantaged communities throughout the Region and discusses their critical water-related needs. It discusses the mechanisms that were

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used to involve DACs in the planning process, identifies environmental justice concerns, and mechanisms that were used in development of the Plan to ensure that implementation of the plan addresses Environmental Justice concerns. Because DAC and EJ involvement is considered critical to the RWMG, the San Diego IRWM Plan goes further than identifying actions that have already been taken and identifies supplemental actions that will be taken in the future to further enhance DAC and EJ participation. Because the San Diego IRWM Plan fully addresses the scoring criteria for Disadvantaged Communities – Environmental Justice, the RWMG requests that the San Diego Step 1 application receive 10 points for fully addressing this criterion.

Thank you in advance for your consideration in addressing our comments. Should you have any questions or seek further information regarding this matter, please contact Mark Stadler, Principal Water Resources Specialist at the San Diego County Water Authority, at 858-522-6735.

Sincerely,



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cc: Regional Advisory Committee to the San Diego Integrated Regional Water Management Plan