

June 5, 2008

DWR IRWM

Subject: San Luis Obispo County Comments on “Changes made to IRWM Plan Standards from P50 through the P84 process”

Governance – In our Region under Prop 50 guidelines, a Regional Agency was responsible for maintaining the region’s IRWM Plan. This Regional Agency has an official Water Resources Advisory Committee made up of all the water interests in the Region that provides recommendations to the Regional Agency’s governing body to guide every aspect of the Region’s IRWM Plan development and maintenance. The new standard does not say Regional Agency and only references a Regional Water Management Group. If this is intentional, it will change our regional governance structure that has been in place to cooperatively manage water in our region for over 50 years.

What is the purpose of eliminating the Regional Agency governance option? Our Region is very anxious to meet with DWR to discuss the impact of this proposed standard as well as the region acceptance process.

Objectives – It says “may” prioritize; does this mean Plans that do will be judged differently? If so, consider saying “should prioritize, otherwise provide adequate justification for not doing so” (i.e. record of the Regional Management Group’s decision on the topic and conclusions).

\*Organizational Suggestion - Resource Management Strategies and Integration are both sub-standards to the Project Review Process.

Project Review Process – Please include language that allows “planning level” projects (especially since the IRWM Planning process in itself generates ideas for new projects through the consideration of resource management strategies) to be included in the project review process. As is, the guidelines suggest that only projects that are far enough along to have an associated technical feasibility study, alternatives analysis and economic analysis of benefits completed can be in the Plan. If the IRWM Plan is a living, ongoing Plan, it should have projects at varying stages included in it, and not be marked down for including them.

- Consider naming it “Project Identification, Review and Prioritization Process”;
  - Identification being either through the Plan process in the consideration of Resource Management Strategies or through existing sub-regional processes;
  - Review being collection of critical project information such as scope, schedule, budget, feasibility, etc. – i.e. some of the listed factors and consideration of Integration;

- Prioritization being the consideration of the project's ability to meet prioritized objectives of the Regional Group such as multiple benefits, potential for integration, etc. – i.e. some of the listed factors.
- Consider stating “factors to *consider*” rather than “include” in order to facilitate documentation of the project identification, review and prioritization process

\*Organizational Suggestion - Plan Performance, Data Management, Financing, [IRWM Plan] Technical Analysis, Relation to Local Water Planning, Relation to Local Land Use Planning, Stakeholder Involvement and Coordination are all sub-standards to Governance.

Plan Performance, Financing – These standards have language for monitoring the performance of and financing both the IRWM Plan and individual projects. References to individual project performance and financing should be in the Project Review Process standard to avoid confusion and distinguish between the Regional Water Management Group's responsibility to ensure the IRWM Plan is successfully maintained in terms of financing and governance and individual and/or groups of agencies' responsibility to finance projects and monitor their success.

Technical Analysis – This standard seems to be covered under the “technical feasibility” guideline of the Project Review Process standard for individual projects and the “description of the process used to develop Plan objectives” guideline of the Objectives standard for the IRWM Plan, and possibly the Governance standard.

Climate Change – Technical consideration of climate change should be included in the Project Review Process standard.

Thank you very much for the opportunity to comment.

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