

Pajaro River Watershed IRWMP Collaborative



Cooperative Water Planning by Pajaro Valley Water Management Agency, San Benito County Water District and Santa Clara Valley Water District

October 19, 2007

Mr. Joe Yun
California Department of Water Resources
P. O. Box 942836,
Sacramento, CA 94236

Dear Mr. Yun:

Thank you for the opportunity to provide input on the development of the Integrated Regional Water Management (IRWM) Grant Program. This input is being offered by the Pajaro River Watershed Collaborative, which is comprised of the Pajaro Valley Water Management Agency, San Benito County Water District and Santa Clara Valley Water District. Having recently completed and adopted the Pajaro River Watershed IRWM Plan, our three agencies recognize the significant effort involved in developing a plan that is responsive to both regional needs and statewide quality standards. As the Department of Water Resources (DWR) develops new standards and implementation grant concepts for the IRWM Grant Program, we would like to offer input in the following areas:

- IRWM Plan Standards
- Governance Standard
- Project Review Standard
- Climate Change
- Plan Adoption
- Proposition 84 IRWM Funding Area Allocations

IRWM Plan Standards

We appreciate DWR's proposal to maintain standards throughout the life of Propositions 84 and 1E funding programs. We concur with the sentiments expressed by many regions during the Proposition 50 funding program regarding the difficulty of having to adjust to changing standards. Therefore, our recommendation is to establish the standards for Propositions 84 and 1E at the start of the grant program and to maintain those standards throughout all rounds of funding. We believe that establishing the ultimate quality of planning that DWR expects at the onset of the program will promote efficiency in regional planning because we will have a clear vision of our end target.

Additionally, to the extent which it is within your department's control, we would encourage DWR to establish plan standards that will be maintained not only through Propositions 84 and 1E but also through future funding programs.

Governance Standard

Our three agencies entered into a Memorandum of Understanding (MOU) in October 2004 for the purpose of coordinating water resources planning and implementation activities watershed-wide. Our commitment to work together through this MOU naturally led to our collaboration on the Pajaro River Watershed IRWMP. We have found the MOU to be an effective governance structure, and we strongly believe that an MOU should be an acceptable form of governance.

If there are specific conditions that DWR would like to see included in an MOU, we feel those conditions would be appropriate to include within a governance standard. We do not feel it would be appropriate, however, to require a specific type of governance structure.

Project Review Standard

It is our understanding that, if DWR eliminates Economic Analysis from the Implementation Grant program, regional project review processes would be required to have an economic evaluation process. We agree that economics can be part of the project review process, but we do not think that DWR should specify where in the review process that evaluation occurs. In the Pajaro River Watershed IRWM Plan, we do not incorporate economic analyses into our initial project prioritization because we feel that we could lose the synergy offered through integration of projects if we rule projects out early in the process based on economics. As part of the implementation of our IRWM Plan, we do require economic evaluations of individual projects.

We also caution DWR from developing standards which would require projects to demonstrate a benefit cost ratio greater than one, as disadvantaged communities would most likely suffer disproportionately by such a requirement.

Following confirmation that an IRWM region has developed an appropriate project review process, we request that DWR defer to approved local project selection.

Climate Change Standard

Each of our agencies recognizes the effect of climate change on the management of our water resources. Within the context of an IRWMP, we feel that climate change should be addressed on a qualitative rather than a quantitative basis. While we support planning that prepares for the effects of climate change, we do not think that climate change should be incorporated into the Project Review Standard or required as part of IRWM project level analyses.

Project sponsors are required to evaluate environmental impacts as part of the environmental documentation, and we feel that climate change impacts of individual projects should be captured by the environmental review process.

Plan Adoption

We believe that the development of new plan standards does not necessarily require the re-adoption of IRWM Plans. If the new IRWM Plan standards call for the consideration of new elements (e.g. the California Water Plan resource management strategies, climate change) and the framework described in the IRWM Plan provides a mechanism for incorporating those new elements, we do not feel that re-adoption is warranted.

Specifically regarding the California Water Plan strategies, regardless of whether or not specific strategies are currently discussed in the IRWM Plan, we feel that if there is an existing process within the

Plans for considering new strategies then re-adoption should not be required. We feel this is especially important considering the evolution of the California Water Plan and the uncertainty in the water management strategies that will be included in the next update.

The following are plan modifications that we agree would trigger re-adoption:

- New, revised or eliminated goals and objectives
- Revised IRWM regional boundaries
- Revised project prioritization process

Proposition 84 IRWM Funding Area Allocations

Regional representatives from each of six IRWM regions within the Central Coast Funding Area have met and agree that our long term interests are best met by working together to develop a coherent approach to benefit all planning regions within the funding area. In light of this agreement, the six IRWM Regions have developed the Central Coast Area Statement of Principles. Consistent with the Central Coast Area Statement of Principles, the Pajaro River Watershed Collaborative is committed to pursuing coordinated action and no unilateral action in seeking Proposition 84 (IRWM) funds allocated to the Central Coast Funding Area.

We are interested in working with the other Central Coast IRWM regions to provide DWR with input on the allocation of funding within the Central Coast Funding Area; however, recognizing that legislature requires the allocation of funds to be a competitive process, we request that DWR define the type of input that would be accepted.

Sincerely,



Bruce Laclergue, General Manager
Pajaro Valley Water Management Agency



Lance Johnson, District Manager/Engineer
San Benito County Water District



Tracy Hemmeter
Santa Clara Valley Water District