



October 17, 2013

California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236
Attn: Ted Daum

Re: Comments to Draft Addendum – Appendix H – of 2012 Prop. 84 IRWM Guidelines

Dear Mr. Daum:

Thank you for the opportunity to provide input into the development of the Prop. 84 IRWM Guidelines Addendum regarding the Plan Review Process. Below are comments made on behalf of the Inyo-Mono IRWM Program Office.

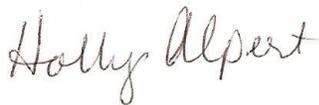
- There are numerous typos and grammatical errors throughout the document. Please ensure that the document is proofread multiple times before it is finalized. We found errors on pages 89 (2 errors), 91, and 92.
- Page 91: the document indicates that the IRWM Plan should be submitted electronically via CD/DVD or e-mail. We encourage adding the Grants Review and Tracking System as a method for submitting the Plan.
- Page 91, VII. Review Process: In the second paragraph, it is unclear whether one “no” determination for a Plan standard means the entire Plan fails the review. We assume that if a Plan standard is determined to be insufficient, DWR will work with the IRWM region until that standard is sufficient and the entire Plan passes the evaluation. Please clarify the process in this section.
- Page 96, Region Description Plan Standard: The last requirement for the standard is “Define maximum opportunities for integration of water management activities.” This requirement, as worded, is vague and unspecific. Please alter the wording to add specificity to the extent of the previous requirements for the standard.
- Page 98, Resource Management Strategies Plan Standard: A distinction needs to be made between California Water Plan RMS and IRWM Plan RMS. In the first requirement, it should read: “Identify California Water Plan (or CWP) RMS incorporated in the IRWM Plan.” The third requirement should read: “Address which CWP (? It is unclear whether this is referring to CWP or IRWM Plan RMS) RMS will be implemented...”
- Page 98, Resources Management Strategies Plan Standard: The second requirement,

regarding climate change, needs to be re-worded. It does not make sense as it is written. One suggested re-wording is: “A consideration of climate change effects on the IRWM region must be factored into the RMS.”

- Page 98, Resources Management Strategies Plan Standard: Why are there two tables for this one standard on p. 98? It looks like they should be one table.
- Page 100, Impact and Benefit Plan Standard: The first requirement should read: “...impacts and benefits of plan implementation **within** IRWM region,...”
- Page 100, Impact and Benefit Plan Standard: In the second requirement, “analyses” should be singular (“analysis”).

Feel free to contact us with any questions about these comments.

Most Sincerely,

A handwritten signature in cursive script that reads "Holly Alpert".

Holly Alpert
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