



October 16, 2013

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

**SUBJECT: PROPOSITION 84 DRAFT ADDENDUM TO IRWM PROGRAM GUIDELINES –
APPENDIX H: IRWM PLAN REVIEW PROCESS**

Dear Mr. Daum:

The Upper Salinas Las Tablas Resource Conservation District (US-LT RCD) supports the comments and alternative approaches submitted to your Department by the San Luis Obispo County Integrated Regional Water Management (IRWM) Regional Water Management Group (RWMG) regarding the Draft “Addendum to the 2012 IRWM Guidelines – Draft August 2013 Appendix H: Plan Review Process” (Draft Addendum). Please consider implementing revisions suggested herein before finalizing the Draft Addendum.

Our Region is committed to further developing and implementing our local IRWM Plan and Program to address our highest priority resources challenges. Additionally, we understand your Department is tasked with assessing “*whether the IRWM Plans are consistent with the IRWM Planning Act and the related IRWM Plan Standards contained in the 2012 IRWM Program Guidelines*” and providing “*a standardized means to review IRWM Plans for consistency.*” We believe the following revisions to the Draft Addendum would better support both efforts.

Alternative Approaches:

We propose the following alternative approaches to improve efficiency of and expedite your Department’s technical review of regions’ IRWM Plans, while still empowering local stakeholders to manage and assess their local IRWM Programs. Proposed alternatives are:

- Alternative A – RWMG Self-Assessment with DWR Technical Review. Have RWMGs complete the Exhibit H-1 “2012 IRWM Plan Standards Review Tool Form” provided in the Draft Addendum, indicating whether the region’s IRWM Plan addresses Guideline requirements (and on what page(s)), followed by a brief verification by DWR Staff; and/or
- Alternative B - Streamlining Technical Review. Assign DWR Staff to regions so review can be conducted during the public comment period associated with IRWM Plan development just prior to adoption.

Comments on Review Duration and Required Response:

Under Draft Addendum “Section III. When to Submit,” please shorten the IRWM Plan submittal deadline from six (6) months to three (3) months prior to grant application deadlines. This still allows DWR Staff adequate time to conduct its estimated two (2) month technical review, while not taking away critical time for regions to ensure plans are robust and publicly vetted.

Under Draft Addendum “Section VIII. DWR Response” (sub-header “If Revisions are Necessary”), please allow RWMGs to make corrections up until the Round 3 Implementation Grant draft funding recommendations are made. This still provides your Department the opportunity to deem regions ineligible for grant funding if plans do not adequately address the Guidelines, but provides sufficient time for regions to follow a public stakeholder process to make the necessary revisions.

Thank you for considering our SLO IRWM Region’s comments when finalizing the Draft Addendum.

Sincerely,



Laura Edwards, *Executive Director*
Upper Salinas Las Tablas
Resource Conservation District
laura@us-ltrcd.org | www.us-ltrcd.org