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To: Daum.Theodore@DWR
Subject: Comments on Draft Plan Review Process
Date: Friday, October 18, 2013 5:03:44 PM

Ted:

Thank you for the opportunity to comment on the Draft Plan Review Process. Rather than have an attachment, I'm providing our comments within this email, which are numbered below for easy reference. I'm sure you'll find this acceptable.

On behalf of the Upper Santa Margarita Watershed IRWM Planning Region, the following comments are submitted for DWR consideration on the Draft Appendix H Plan Review Process, Addendum to the 2012 IRWM Guidelines:

1. Page 89, III. When to Submit: The first sentence seems more appropriate to say "when IRWM Plans can be submitted" rather than "that IRWM Plans can be submitted". This will confirm to the regions the appropriate dates and timelines in the email that DWR will send out with its notification.
2. Page 89, IV. What to Submit, 2nd bullet: "Name, title and organization" is a bit confusing. I first thought it meant name and title of the contact person, but that's in the 5th bullet. It seems that DWR is looking for the "name and type of organization." Please be more clear in this bullet.
3. Page 92, Public Comment Period: The first paragraph references only a "10-day public comment period" and does not state anything about the timeline for RWMG response to DWR's review. It goes on to say "DWR will share the public comments for a particular IRWM plan with the RWMG for that region and will determine whether the comments required being addressed in the plan." It also says that "Final determination of IRWM standard consistency will be made after this 10-day public comment period as follows". So, what follows includes a statement in the third paragraph that says "DWR will contact the RWMG after the 10-day public comment period to determine the status of the RWMG's response. It is incumbent on the RWMG to respond in a timely manner....". This clearly suggests that there is no specified timeframe for the RWMG to respond to DWR's review, but only "in a timely manner". Further, this would mean that the 10-day public comment period is strictly for the public and not the RWMG, particularly if DWR will be providing the public comments to the RWMG for further addressing them in its plan, and asking what the status of response is. This section needs to be clear that the RWMG response is separate from the "public comment period", and that the RWMG will have additional time after receiving public comments to get its response completed and returned to DWR. This process for the RWMG from the time of first receiving the DWR review should be about 30 days.
4. Page 92, If Revisions are Necessary: This section is silent to the timeframe that DWR will have to receive the RWMG response, review and make a determination of adequacy to meet Plan Standards. Since the first review of the plan is noted as 60 days, a timeframe for DWR on the review of the review of RWMG response should also be noted.
5. Page 92, If Revisions Are Necessary: In the second paragraph of this section, it says "If revisions are not adequate to make the IRWM plan consistent with standards, the reasons for the inadequacy will be included in the follow-up response mail to the RWMG, the review will be finalized and posted on the web." Obviously, the process seems to end here in the write up, but for the RWMG this is unacceptable since this would make the region ineligible for grant funding. If this is true, this section should state this and also include the next steps the region can take to continue to work toward making a compliant IRWM Plan. The way it's written now it suggests only one round of comments, review and response can be made and nothing further, but the RWMG, obviously, will want to and continue to pursue a standards compliant IRWM Plan. So what are the next steps for DWR and the RWMG? This should be stated in this section.
6. Page 93, Exhibit H-1, Introduction: The first sentence should be revised to include "deemed consistent", such as "IRWM plan regions must have an IRWM Plan that has been reviewed and deemed consistent with IRWM Plan Standard by DWR for compliance prior to receiving Round 3 Proposition 84

funding."

7. Page 93: This says that there is "no numeric scoring" and also says that "a passing score of "C" (i.e., 70% of the requirements for a given Plan Standard)"... but no where in the forms is there a place to total the yes or no's to come up with a percentage. The forms should be changed to show this "scoring".

Thank you for the opportunity to provide comments.

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