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Cc: [Hughes, Susan](#); [Rodriguez, Lynn](#)
Subject: Comments on Addendum to the 2012 IRWM Guidelines, Appendix H, Plan Review Process
Date: Thursday, October 10, 2013 4:38:38 PM
Attachments: [ATT00001.bmp](#)

Dear Ted:

Thank you for the opportunity to comment on the Addendum to the 2012 IRWM Guidelines, Appendix H, and Plan Review Process. The Addendum provides helpful guidance to IRWM Regions regarding the process for reviewing and evaluating our IRWM Plans. We appreciate the inclusion of the Standards Review Tool Form which details how the content in each section of the Plan will be “scored.” This objective review method will provide for more consistency among the reviewers and is preferable to a more subjective, qualitative review.

The Watersheds Coalition of Ventura County (WCVC) respectfully submits the following comments, which we believe will improve the clarity of the document and the process.

Plan Submittal Deadline: The draft Addendum calls for a plan submittal deadline of “6 months prior to the application due date for future grant solicitations.” The application due date for Round 3 has not yet been set, and it is possible that the due date could be as early as December of 2014. This could cause a timing problem for some regions. We recommend that the plan submittal deadline be reduced to no more than five months prior to the grant application due date.

Review Process: We support the plan to have a team of two technical reviewers assigned to review each Plan. This will help eliminate some of the potential for subjectivity by a single reviewer and provide more consistency across all plan reviews.

Review Timing: The language regarding how DWR will conduct plan review and what is required (adopted final plan vs. non-adopted version) is unclear and could result in time constraints with our current schedule. Some regions, such as WCVC, will fit into both Scenario A and Scenario B and will be facing Planning Grant and Implementation Grant deadlines very close together in the first part of 2014. The timing of DWR’s review (up to 60 days – as stated on page 91) would require some of us to complete and adopt our plans sooner than we had anticipated in order to meet our grant deadlines. ***When we executed the final Implementation Grant Agreement on May 1, 2012, the 2-3 month Plan Review Process (including DWR review and public comment) was not anticipated and not included in our Planning Grant schedule.*** Our goal is to have all our major stakeholders adopt the final plan; this process can take up to three months. If we wait for DWR review of our IRWM Plan prior to adoption, we could fall even further behind our schedule. We would appreciate a letter from DWR notifying us that those IRWM Regions making a good faith effort to complete their plans for submittal to DWR for review will be in compliance with their Implementation Grant deadline of two years from the grant agreement execution date. We do not want to default on our grant agreement; we

are concerned the timing of the review process may delay our final plan adoption.

On page 90 where the scenarios are each highlighted, it would be helpful to re-state the definition of each scenario at the beginning.

Exhibit H-1 – Standards Review Tool Form: Again, we appreciate the evaluation process clarity and objectivity. Throughout, the tables are abbreviated statements of the “shalls” and “musts” from the Guidelines. In some cases the language used in the interest of brevity is not quite accurate and can mislead any readers who are not familiar with the Guidelines (some stakeholders in regions may read the plan evaluation but not the more detailed Guidelines). For example, on page 99 the Project Review Process Standard, references “projects” rather than “project review process” in many of the Requirement statements. For example, “Address how the project contributes to plan objectives,” should read, “Address how the project review process ensures that the projects contribute to plan objectives.” These two statements have different meanings. Each statement of the Requirement for each Standard should be reviewed to be sure the “shorthand” description is the same as the intent of the Standard.

The Guidelines discuss the Finance Standard over several pages (page 21, 56 and 57). The wording on page 21 states that “The IRWMP Plan must include a plan for implementation and financing of identified projects and programs”. But the wording on page 56 states “The IRWMP Plan must contain the following: A program-level description of the sources of funding, which will be utilized for the development and ongoing funding of the IRWM Plan; The potential funding sources for projects and programs that implement the IRWM Plan.” We would suggest the Review Tool in the Finance Standards be consistent with the text on page 56 and be modified as follows:

~~Include a plan for implementation and financing of identified projects and programs including the following:~~

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List known, as well as, possible funding sources, programs, and grant opportunities for the development and ongoing funding of the IRWM Plan

List the potential funding mechanisms, including water enterprise funds, rate structures, and private financing options, for projects that implement the IRWM Plan.

Corrections:

- Page 89, line 8: “DWR’s” should read “DWR.”
- Page 92, line 7: the word “indicating” should be “indicate.”
- Page 92, line 19: The word “exists” should be singular.
- Page 98 – the second table has the wrong header – it should read Integration, not Resource Management Strategies.
- Page 100, first table: The first Requirement, second line says “implementation **with**

IRWM Region.” This should be changed to “**within** each IRWM Region.”

Thank you again for the opportunity to comment. We look forward to working with DWR staff through the review process.

Best Regards,

Sue Hughes and Lynn Rodriguez

