CITY OF **CUDAHY** CALIFORNIA

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September 3, 2009

Lester Snow
Department of Water Resources
1416 Ninth Street
Sacramento, CA 94236-0001
Email: DWR_IRWM@water.ca.gov

Re: Request for reconsideration of the RAP denial of the LA Gateway IRWM JPA Authority (Gateway Authority)

Dear Director Snow:

The City of Cudahy is surprised and very disappointed that DWR has preliminarily denied the Gateway Authority's status as a Regional Water Management Group (RWMG). The Gateway Authority meets all of the criteria set forth in the RAP Guidelines, and the decision by DWR does not appear to be based on any regulation or legislation. There is no substantive argument for denying the Gateway Authority's application, as evidenced by the dismissive summary given by DWR staff:

> *"...the rationale for forming a separate IRWM Region, exclusive of the GLAC IRWM Region, is not compelling. Therefore, DWR does not approve the Gateway Region."*

DWR's implication that there is boundary overlap with the Greater Los Angeles County group is a matter of perspective. Our elected officials, as members of the board of the Gateway Cities Council of Governments, specifically mandated the formation of the Gateway Authority to address the integrated regional water planning needs of Southeast Los Angeles County. Only the Gateway Authority has the sanction of the 27 Gateway Cities. We purposefully and collectively did not sign the current GLAC MOU. *None of the cities in this region have consented to regional water management representation by any other agency.*

There is a historic and well-documented neglect of the Gateway Region by larger County planning efforts in a multitude of disciplines. Though DWR acknowledges as much in the Recommendations for the GLAC Region, they have not proposed a remedy for this inveterate problem; in fact the approval of their region imposes no consequence.

In addition to satisfying all of the requirements of a RWMG, the Gateway Authority has a successful record of effective governance and integrated planning for regional water needs. The Gateway Authority has secured a $10 million grant to improve water quality in the Los Angeles River and is administering a Metals TMDL monitoring and implementation plan in the San Gabriel River, funded by member agencies. I know that you look for evidence of a region's collaborative efforts in context with adjacent regions, i.e., how well the work is coordinated, the degree of integration, and the development of a vision. Because we have not yet gone through the planning effort with respect to adopting a plan, our actions have to speak for us, and I think you can agree that we have demonstrated our ability to cooperate and be inclusive. We brought into this project nine entities that are not members of the JPA but needed our help. Well done is better than well said.

To equitably address regional water needs, it is imperative that the Gateway Region maintain strong local leadership in water management issues. We request that you reconsider and reverse the preliminary decision to deny the Gateway Authority's RWMG status consistent with the intent and purpose of IRWM legislation and acknowledge the qualifications of the Gateway Authority as a Regional Water Management Group.

Sincerely,

George A. Perez, City Manager