CITY OF SIGNAL HILL

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September 15, 2009

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

Subject: Request for Reconsideration of the RAP Denial of the LA Gateway IRWM JPA Authority (Gateway Authority)

Dear Director Snow:

The City of Signal Hill is surprised and very disappointed that DWR has preliminarily denied the Gateway Authority's status as a Regional Water Management Group (RWMG). As you know, the 27 cities in the Gateway Region represent over 2.1 million Californians. We believe that the Gateway Authority meets all of the criteria set forth in the RAP Guidelines and are requesting that you reconsider and reverse the tentative decision to deny RWMG status to the Gateway Region.

We are very concerned that the decision by DWR does not appear to be based on any regulation or legislation. There appears to be 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."*

The DWR staff implication is that there is overlap with the Greater Los Angeles County (GLAC) group. 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 the larger County planning efforts in a multitude of so called "regional plans," including a the historic lack of receiving a fair share of the Gateway Region's transportation funding through the Metropolitan Transportation Authority based on our contribution of funds. Though DWR acknowledges that the Gateway Region will be under represented in the GLAC Region, staff has not proposed a remedy for this entrenched problem of under representation. In fact the approval of the GLAC region by DWR will further exacerbate the funding inequities that have severely impacted our region for decades. It is important to note that the Greater Los Angeles Region would be 2,058 square miles in size, consisting of 83 cities and multiple other agencies, which is too large to be an effective planning unit.

The Gateway Region makes a compelling regional economic development case for forming its own RWMG, in order to better direct water infrastructure investments in Southeast Los Angeles County. The Gateway region has suffered from chronic unemployment for the last decade. Currently, the local city unemployment rates (July 2009) are among the highest in all of California. Fifteen of the areas 27 cities have unemployment rates greater than the State rate of 12.1% and the Los Angeles County rate of 12.5%. The average unemployment rate in our area is 13.4%, with the City of Commerce at 21.8%, Compton at 20.9%, Bell Gardens at 19.6%, Lynwood at 19.5%, Huntington Park and Paramount at 18%. There are over 33,200 person unemployed in the City of Long Beach alone. The County of Los Angeles has been unable to devote sufficient resources to the Gateway Region to solve this state of chronic unemployment.

It is also important to note that the DWR staff is already recommending splitting Ventura and Los Angeles County from each other, as well as splitting Los Angeles County between the Antelope Valley and the GLAC group. DWR staff has also recommended splitting Orange County into three groups. Kern County will be divided into four groups and greater Sacramento area is split into ten groups. Many of these planning groups are smaller in size and have less population than the Gateway Region.

In addition to satisfying all of the requirements for being a RWMG, the Gateway Authority has a successful track record of effective governance and integrated planning for regional water needs. The Gateway Authority 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.

We recognize 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 we think you can agree that the Gateway Authority has demonstrated its ability to cooperate and be inclusive. The Gateway Authority brought into the grant project nine cities that were not members of the JPA but needed our help.

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,

Mayor Ellen Ward

cc: Senator Alan Lowenthal
Assemblymember Bonnie Lowenthal
City Council
Ken Farfsing, City Manager
Charlie Honeycutt, Deputy City Manager
Barbara Munoz, Director of Public Works