



COUNTY OF SAN LUIS OBISPO

Department of Public Works

John Diodati, Director

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Financial Assistance Branch  
Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236  
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SENT VIA EMAIL

Attention: Round 2 IRWM Implementation Grant Program

Thank for the extended time to comment on the draft Guidelines, Proposal Solicitation Package (PSP) and associated attachments. We appreciate the streamlined application process and deference to regions and funding areas that have side agreements, such as the Central Coast Funding Area.

The San Luis Obispo County Flood Control and Water Conservation District (District) serves as the Lead Agency for San Luis Obispo Region's Regional Water Management Group (RWMG). With that, the RWMG has reviewed the documents and provides the following as comments.

1. CASGEM / SGMA.

While the Guidelines & PSP defer to SGMA for those basins subject to and under SGMA, Attachment 1 does not. Can this be updated to reflect deference to SGMA as appropriate?

2. Disadvantaged Community (DAC) Definition.

The criteria for determining DAC status appears to be unresolved, specifically related to the accepted 5-year American Community Surveys (ACS) Median Household Income (MHI) intervals. The PSP references 2012-2016 5-year ACS data (Section III.D), however, at the virtual workshops it seemed DWR's intent to lean on soon-to-be published 2016-2020 5-year ACS data.

We have found that there is a wide variability in this survey information for small to very small communities. We request that DWR allow for 2012-2016, 2014-2018 or 2016-2020 5-year ACS data to be used in the determination of DAC status. The older intervals (i.e. 2012-2016) align with the timing of Proposition 1, our region-specific Disadvantaged Community Needs Assessments, and DACTI program projects. We further request that DWR provide these time intervals on their DAC Mapping tool, accessible at <https://gis.water.ca.gov/app/dacs/>

3. Attachment 7, Question 4, Recusal language.

We understand the importance of this requirement, particularly given that DWR is open to recognizing the local competitive process. It appears DWR's intent is to see that there has been a public and transparent process with oversight and "approval" by entities not applying for grant funds. We request that DWR provide clarification of this statement with their intent and allow regions to individually show their competitive processes, as we imagine each region will have a unique way of accomplishing this.

For example, under the current written language, our entire governing body (District Board of Supervisors) would have to recuse themselves since we will be requesting grant administration funds, and perhaps, if selected by the RWMG, a District project. We do not think this was the intent of this requirement so further clarity would be appreciated. I would be happy to discuss our process with DWR staff to help facilitate changes to this question that would work for regions and DWR.

4. Application Due Date.

We request that the application due date trail the release of the final documents by at least 6 months to facilitate local project selection processes. For example, our application approval process involves 3 separate public "Brown Act" stakeholder/governing bodies.

5. PDF of Online Application

We heard during the virtual workshop that DWR has removed the Project Information Form (PIF) primarily because the online application duplicates the PIF. One advantage of the PIF was that completing the online application was streamlined for applicants. Can DWR provide a digital copy (i.e. PDF) of the online application so we can be prepared and know exactly what questions/fields are required for completing the GRanTS application?

Thank you for your consideration of these comments. Please contact Brendan Clark, IRWM Program Manager for the San Luis Obispo Region for any follow-up questions or discussion. He can be reached at [bclark@co.slo.ca.us](mailto:bclark@co.slo.ca.us) or (805) 788-2316.

Sincerely,

San Luis Obispo County Regional Water Management Group



Brendan Clark, PE

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