



COUNTY OF SAN LUIS OBISPO

Department of Public Works

John Diodati, Director

February 2, 2022

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.

With that, the San Luis Obispo County (SLO) Regional Water Management Group (RWMG) has reviewed the documents and provides the following as comments.

1. CASGEM / SGMA.

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

2. Disadvantaged Community (DAC) Definition.

Our understanding of the draft documents is that it's the intent of DWR to allow communities to utilize the 2012-2016, 2014-2018 and/or 2016-2020 5-year American Community Surveys (ACS) data for determining Median Household Income (MHI) and, therefore, DAC status. 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 any of these three time intervals of 5-year ACS data to be used in the determination of DAC status. 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 8, Question 4, Recusal language.

We recognize the importance of this requirement, particularly given that DWR is open to recognizing the local competitive process. It appears DWR's intend 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 the 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 and authorizing body (the County Board of Supervisors) would have to recuse themselves since we will be requesting grant administration funds, and perhaps, if selected by the RWMG, a County project.

4. Application Due Date.

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

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 or (805) 788-2316.

Sincerely,

San Luis Obispo County Regional Water Management Group

Brendan Clark, PE
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