



GUADALUPE - COYOTE RESOURCE CONSERVATION DISTRICT

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March 15, 2012

Via facsimile and first class mail

Neelima Palacherla, Executive Officer
LAFCO of Santa Clara County
70 West Hedding Street
11th Floor, East Wing
San Jose, CA 95110
(408) 295-1613 (fax)

Re: Implementation of the Recommendations of LAFCO's 2011 Countywide Water Service Review Report

Dear Ms. Palacherla:

The Guadalupe Coyote Resource Conservation District (GCRC) has reviewed Chapter 8 of the 2011 Water Service Review Report (Service Report) and begun developing a plan to implement the recommendations presented therein. As requested in your letter dated February 12, 2012, we outline our plans for implementation below.

As stated in our November 23, 2011 comments on the revised, draft Service Report, we support the Water Service Review's aim of improving the accountability and efficiency of special districts and other agencies providing water-related services in Santa Clara County. We believe that current GCRC programs and practices provide a range of unique and valuable services. However, the GCRC is always open to recommendations for enhancing the efficiency of our organization and the benefit of our programs. To this end, we have initiated a search for an Executive Director to coordinate daily operations, and to improve conservation programs by building up the GCRC's technical and fundraising capacities.

A. LAFCO Recommendations for Improving Accountability and Transparency

The GCRC intends to implement the LAFCO's recommendations for improving accountability and transparency as described below.

1. Continue to populate website with further information and documents

The GCRC is working to implement this recommendation. We have directed staff to prioritize website management activities and develop a plan to populate the website and maintain the currentness of information posted. More specifically, the GCRC has directed staff to research the following strategies to determine which would be more efficient:

- Training staff to manage the website;

- Seeking out volunteer(s) with appropriate expertise to carry out initial information upload and/or provide ongoing management for the GCRCD website;
- Contracting with a web/IT consultant to populate and/or manage the GCRCD website; and
- Partnering with other resource conservation districts or local non-profits to share resources and expertise necessary to manage the website.

The GCRCD Directors have committed to work with staff to evaluate existing information that should be posted on the website, and to determine what information the GCRCD should develop for its website.

The timeframe for implementation of planned activities is six to nine months, with an ongoing commitment to maintenance and upkeep of the website.

2. **Prepare a plan for services that the District intends to provide that do not overlap with SCVWD efforts or SCVWD's enabling act**

The GCRCD is identifying and developing proposals for additional projects it can provide that are within the scope of its existing services, but do not overlap with work being done by the Santa Clara Valley Water District (SCVWD). These projects include:

- Riparian and watershed restoration projects on private land not meeting SCVWD's criteria for expenditure of funds (e.g. property which is not owned in fee title or under easement, and on which action is not necessary to protect SCVWD infrastructure and/or public safety).
- Activities not directly related to water resource management and flood protection, such as sustainable farming programs, small parcel livestock and land management, and wildlife habitat management efforts.

In developing these projects, the GCRCD will try to prioritize those that are eligible for non-competitive Natural Resources Conservation Service (NRCS) funding (such as the Environmental Quality Incentives Program). The GCRCD has begun consulting with the NRCS and other RCDs to learn more about how to create successful proposals for funds. We already have learned that it may be necessary to increase our technical capabilities in order to apply for and carry-out NRCS funded projects, so we intend to pursue one or more of the following strategies:

- Working with the NRCS to secure a summer intern position;
- Partnering with neighboring RCDs to pool technical expertise; and/or
- Hiring additional full or part-time staff to provide technical services.

As stated above, the GCRCD is planning to hire a full or part-time Executive Director to help with day-to-day and long-range, strategic operations. We expect the Executive Director to assure that the GCRCD's project-load includes a range of services by effectively managing new and existing programs, and actively pursuing appropriate grant opportunities. More generally,

hiring an Executive Director is expected to allow the GCRCD to provide a more consistent and professional level of service across all programs and services.

The GCRCD has been consulting with neighboring RCDs to identify opportunities and funding to implement additional projects, either on its own or in collaboration with others. While the GCRCD is considering opportunities to collaborate with others on projects that may have a broad geographic scope, it is also focused on developing projects within its service area.

As part of its effort to develop and implement new projects, the GCRCD plans to develop specific criteria for selecting future projects. We will also develop criteria for evaluating successful completion of projects as part of the annual work plan, and improve project tracking to better document the extent to which tax payer funds within the GCRCD service area are leveraged through grants and other organizational partnerships for the benefit of GCRCD's service area.

We expect to have identified specific, new projects, including sources of funding and technical assistance to support such projects, not later than December 2012. We will also have pre-project selection process and a post-project evaluation process in place by that time.

3. **Establish policies and guidelines for reviewing development projects to increase transparency & provide consistency**

The GCRCD intends to revise its long range plan to more clearly articulate the policies and/or standards that will be used in evaluating development projects, including a policy for review and approval of consultant comments to ensure consistency between different reviewers and different projects.

We expect to complete the revision of the long-range plan by December 2012.

4. **Track workload of staff and evaluate staff on a regular basis**

The GCRCD has begun requiring staff to track its time by task/project. Based on our initial review, we have determined that the GCRCD needs an Executive Director to coordinate daily operations and to assist with long-range, strategic planning. The Directors continue to review the allocation of existing staff's time in order to determine whether it is being used effectively, and to inform decisions regarding the Executive Director position. For example, we have not yet determined whether the GCRCD would be better served by a part-time or full-time Executive Director. We want to assure that staff capacity is adequate to meet existing and planned program needs. The GCRCD is also consulting with the California Association of Resource Conservation Districts and other RCDs regarding appropriate staff management practices.

B. Recommendations for Jurisdictional Boundary Changes to Improve Services or Governance

LAFCO recommended “[r]evaluation of Guadalupe-Coyote RCD and its SOI considering the District’s plan and application for new or different services.” It outlined a three-step process for the recommended reevaluation:

1. District returns to LAFCO, by the December 2012 LAFCO meeting, with a plan for services that the District intends to provide that do not overlap with SCVWD’s efforts and could not otherwise be provided by SCVWD through its enabling act.
2. District initiates a request for a change in services and SOI amendment by resolution
3. District submits application to LAFCO

As discussed in more detail above (*see* “Recommendations for Improving Accountability and Transparency”), the GCRCD is developing a plan to emphasize projects that do not overlap with the SCVWD’s efforts. We expect to have identified specific, new projects, including sources of funding and technical assistance to support such projects, not later than December 2012. We will also have a project selection process and a post-project evaluation process in place by that time.

Based on our initial work to identify and develop new projects, we believe that new projects that do not overlap with SCVWD’s efforts may be implemented without changing the GCRCD’s scope of services. The Service Report identifies a range of service types currently provided by the GCRCD, including:

- Watershed management
- Flood plain management
- Waterway protection and restoration
- Scientific studies/education
- Creek cleanup
- Vegetation/habitat preservation
- Farm/range land management
- Native species information/education

See LAFCO Report, pp. 200-201. To evaluate the need, if any, for a change in services or SOI amendment, the GCRCD will review potential projects against this list and our records to identify any projects that do not fall within the categories of existing services. We will consult with LAFCO staff regarding the need to file an application for change in services and/or an SOI amendment if it appears that any of the propose projects may fall outside of these services.

Conclusion

We look forward to working with LAFCO Staff to implement recommendations made in the 2011 Countywide Water Service Review Report to improve our effectiveness in serving the

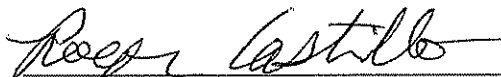
Neelima Palacherla

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interests of our constituents and the broader public. Please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Roger Castillo". The signature is written in black ink and is positioned above a horizontal line.

Roger Castillo, President

GUADALUPE COYOTE RESOURCE CONSERVATION
DISTRICT

(408) 288-5888