



# Best Practices for Agency Comments on Water Plans

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This document provides general guidance for best practices to ensure agency comments, priorities, and issues are addressed in local water plans. Water plan in this document refers to County Water Plans, Watershed District Plans, Watershed Management Organization Plans, and One Watershed, One Plan.

## Water Plan Approval Process

As the agency with oversight and approval authority over water plans, BWSR has the ability to approve or not approve a water plan. In addition to statutory, rule, and policy considerations; BWSR also takes into consideration agency and stakeholder input on the plan in any approval decision. For agencies, there are three primary opportunities to provide input into the plan:

1. **Initial Comment Letter / Response to Request for Information.** Most water planning processes are initiated through a request for information to the agencies and stakeholders. These response letters are valuable to the planning process as they can help set the direction and influence the contents of the plan. For BWSR, these letters are also a key piece of documentation that can be used in the decision-making process. For example, if an agency identifies a specific priority and the plan fails to address it, this may influence BWSR decisions on the plan.
2. **Participation in Advisory Committees.** The advisory committee is where agency staff have the most ability to influence the direction of the plan. This is where information and ideas can be discussed and vetted most thoroughly, and compromise and understanding can hopefully be achieved. This is also where various drafts of the plan are generally presented and informal comments can be provided. For BWSR, knowledge that an agency has participated in the advisory committee adds additional weight or influence to a decision on the plan, especially if particular items are not addressed.
3. **Final Plan Review Comments.** Depending on the type of plan, agencies generally have two opportunities to provide final comment on a plan. This first is typically an official review period (generally 60 days) that is followed by a public hearing, and the second is a final submittal to BWSR and the agencies. For this final submittal, BWSR generally has 90 days to take action on the plan and requests any final agency input in the first 30 days of this timeframe. See the specific water planning statutes or ask the BWSR Board Conservationist for more details.

## Guidance for comments

Participation of agency staff in the planning process is very valuable. Agencies can bring knowledge and information to the planning effort that wouldn't otherwise be available. And, a collaboratively developed water plan can accomplish goals both locally and of the state.

Note that most plan writers do have time set aside for quality control to correct errors in formatting and grammar. However, this quality control is generally not completed until the final drafting of the plan (e.g. just before the plan will be released for official review) and addressing these types of comments early in the process can be costly. For working drafts, agency staff do not need to provide comments on grammar or formatting, unless the error causes confusion. For official review drafts, comments on grammar and formatting are welcome, but it is suggested that these comments are held separately from the more significant comments on content and noted that official response is not needed (e.g. as an attachment to the official comment letter or sent in a separate email to the plan writer).

The table below explains the value of different types of comments in the water planning process.

<b>Practical and Valuable Comments</b>	<b>Less Valuable Comments</b>
<p>The following types of comments can be very valuable to the planning effort:</p> <ul style="list-style-type: none"> <li>• Feedback on the legality or statutory authority of a proposed action or strategy in a plan, and/or consistency with an agency rule or policy.</li> <li>• Identification of opportunities for agency collaboration, including when an agency might be willing to lead and/or funding available through the agency to accomplish a strategy or action.</li> <li>• Identification of alternative methods to identify or accomplish a goal.</li> <li>• Identification of data not reviewed or properly considered, or data that may validate a potential concern or issue.</li> <li>• Work that can or will be done in the future to improve the plan.</li> </ul>	<p>The following types of comments are less valuable to the planning process:</p> <ul style="list-style-type: none"> <li>• Individual comments that have not been vetted or delivered as an agency perspective.</li> <li>• Comments that question a method without suggestions for an alternative method.</li> <li>• Editorial comments, especially in early working drafts of plans, unless the text is unclear.</li> </ul>