STATE OF CALIFORNIA – CALIFORNIA NATURAL RESOURCES AGENCY

EDMUND G. BROWN JR., *Governor*

DEPARTMENT OF WATER RESOURCES
1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791

August 15, 2014

Mr. Brandon W. Nakagawa, P.E.
Water Resources Coordinator
Eastern San Joaquin County Groundwater Basin Authority
1810 East Hazelton Avenue
Stockton, California 95205

Subject: Plan Review Process, Eastern San Joaquin Integrated Regional Water Management Plan

Dear Mr. Nakagawa:

Attached please find the Department of Water Resources (DWR) Draft Review of the Eastern San Joaquin IRWM Plan. DWR has determined that your IRWM Plan is consistent with the IRWM Planning Act and the related IRWM Plan Standards contained in the 2012 IRWM Grant Program Guidelines.

Pursuant to Appendix H of the Guidelines the public comment period for this review will begin on August 15, 2014. The Draft Review will be available for public comments for 30 calendar days on the following website:http://www.water.ca.gov/irwm/grants/prp.cfm.

We will inform you of any comments received. After the public comment period ends the link to the draft review will become inactive on the website. DWR will consider comments, and if necessary work with you on any resultant follow up action. DWR will finalize the review and send it to you prior to posting on our website. The final review cover letter will state the plan's applicability in satisfying existing grant agreement conditions and plan eligibility requirements for future IRWM grant solicitations.

The Draft Review consists of a summary of the overall review and an individual review form for each of the 16 Plan Standards. On the individual review forms locations in the plan are noted for applicable material. Although they may be found elsewhere in the plan, these are the locations of the requirements used to show sufficiency with a given standard.

If you have any questions, please contact Ted Daum at (916) 651-9264 or Theodore.Daum@water.ca.gov.

Sincerely,

Tracie L. Billington, P.E. Chief
Financial Assistance Branch
Division of Integrated Regional Water Management

INTRODUCTION

IRWM planning regions must have an IRWM Plan that has been reviewed and deemed consistent with the 2012 IRWM Plan Standards by DWR for eligibilty to receiving Round 3 Proposition 84 funding. This 2012 IRWM Plan Standards Review Form for DWR staff use provides a consistent means in determining whether the 2012 IRWM Guidelines are being addressed in the IRWM Plan. It is part of the Plan Review Process that will begin prior to Round 3 solicitation. The form is similar to a grant application review form in that there is a checklist for each of the 16 Plan Standards and narrative evaluations where required. However, the evaluation is pass/fail; there is no numeric scoring. Each Plan Standard is either sufficient or not based on its associated requirements. Each Standard consists of between one and fourteen requirements. A Yes or No is automatically calculated in each Plan Standard header based on the individual requirement evaluations. In general, a passing score of "C" (i.e. 70% of the requirements for a given Plan Standard) is required for a Standard to pass. Standards with only one or 2 requirements will need one or both of those requirements to pass. Standards with 3 requirements will need at least 2 of the requirements to pass. Standards with 4 or 5 requirements will need at least 3 to pass. Some plan elements are legislated requirements. Such plan elements must be met in order to be considered consistent with plan standards. A summary of the sufficiency of each Standard is automatically calculated on the Standards Summary worksheet. A "No" evaluation indicates that a Standard was not met due to insufficient requirements comprising the Standard. The evaluation for each Plan Standard and any associated insufficiencies is automatically compiled on the Standards Summary page. Additional reviewer comments may be added at the bottom of each standards work sheet.

Note: This review form is meant to be a tool used in conjunction with the 2012 IRWM Guidelines document to assist in the evaluation of IRWM plans. It is not designed to be a substitute for the Guidelines document itself. Reviewers must use the Guidelines in determining plan consistency.

DEFINITION OF TABLE HEADINGS

IRWM Plan Standard: As named in the November 2012 IRWM Prop 84 and 1E Guidlelines.

Overall Standard Sufficient: This field is either "YES" or "NO" and is automatically calculated based on the "Sufficient" column described below. If all fields are "y", the the overall standard is deemed sufficient. Any entry other than a "y" in the Sufficient column (i.e. "n", ?, not sure, more detail needed, etc.) results in a NO.

Plan Standard Requirements Which Must Be Addressed **Fields with an asterisk * are required by legislation to be included in an IRWM Plan.**

Requirement	Requirements are taken directly from the November 2012 Guidelines.
Included	Is the Guideline Requirement included in the IRWM Plan? The options are: y = yes, requirement is included in the IRWMP; or n = no, requirement is not included in the IRWMP. If only y or n then presence/absence of the requirement is sufficient for evaluation. If there is a "q" (qualitative) then add a brief narrative, similar to a Grant Application Review public evaluation or supporting information.
Plan Standard Source	
2012 IRWM Grant Program Guidelines Source Page(s)	Page(s) in the Guidelines (November 2012) which pertain to the Requirement.
Legislative Support and/or Other Citations	The CWC or other regulations that pertain to the Requirement, **if applicable**. This is for reference purposes. The cell links to a weblink of the regulatory code.
Evidence of Sufficiency	
Location of Standard in Grantee IRWM Plan	The page(s) or sections in the IRWM Plan where information on the Requirement can be found. This can be specific paragraphs or entire chapters for more general requirements.
Brief Qualitative Evaluation Narrative	Supporting information for the Requirement if a "q" is in the Included column. This can be just a few sentences or a paragraph and can be taken directly from the IRWM Plan. Comments or supporting information may be entered regardless of whether required.
Sufficient	Is the Guidelines requirement sufficiently represented in the IRWM Plan (y/n).

2012 IRWM Plan Standards Review Form

Regional Acceptance Process Planning Region: Eastern San Joaquin
Regional Water Management Group: Eastern San Joaquin County Groundwater Basin Authority
IRWM Plan Title: Eastern San Joaquin Integrated Regional Water Management Plan Update

PLAN IS SUFFICIENT

IRWM Plan Standard	Overall Standard Sufficient	Requirement(s) Insufficient
Governance	Yes	
Region Description	Yes	
Objectives	Yes	
Resource Management Strategies	Yes	
Integration *	Yes	
Project Review Process	Yes	
Impact and Benefit	Yes	
Plan Performance and Monitoring	Yes	
Data Management	Yes	
Finance	Yes	
Technical Analysis	Yes	
Relation to Local Water Planning	Yes	
Relation to Local Land Use Planning	Yes	
Stakeholder Involvement	Yes	
Coordination	Yes	
Climate Change	Yes	

* If not included as an individual section use Governance, Project Review Process, and Data Management Standards per November 2012 Guidelines, p. 44.

DRAFT

Additional Comments:

While deemed consistent with the 2012 Guidelines Plan Standards, DWR recommends that the following be addressed in future IRWM Plan updates: Governance: Not clear how the governance structure ensures a notice of intent to prepare/update the plan and that the plan is adopted in a public meeting. **Climate Change:** Section 16.2.5 includes a statement that GHGs will be evaluated, but it is unclear how it will be considered during the review process; adaptation partially addressed (Table 7-1) but limited to flood scenarios in the review process. **Region Description:** (1) Not clear that the IRWM plan helps reduce dependence on the Delta. (2) Opportunities to maximize integration are not clearly addressed. **Objectives:** A discussion of the goals of the region is not presented. **Resource Management Strategies:** The RWMG conducted vulnerability analysis but the plan is not clear how these effects were considered in the selection of applicable RMS**. Project Review Process:** (1) Environmental Justice considerations are not included in the Project Review Process. (2) Project proponent's plan adoption status is not considered in the Project Review Process. (3) Project's contribution to reducing reliance on the Delta is not considered in the Project Review Process. **Impact and Benefit**: A discussion of when a more detailed project-specific impact and benefit analysis will occur is not presented. **Data Management:** Data management QA/QC measures are not discussed. **Stakeholder Involvement:** The plan discusses DAC involvement and states that "No Tribal entities identified in the Plan area". However, the plan does not state how they determined that tribal communities were not present in the region. **Climate Change:** Section 16.2.5 includes a statement that GHGs will be evaluated, but it is unclear how it will be considered during the review process; adaptation partially addressed (Table 7-1) but limited to flood scenarios in the review process

IRWM Plan Standard: Governance						Overall Standard Sufficient	Yes
Requirement	**Included**		**Plan Standard Source**		**Evidence of Sufficiency**		**Sufficient**
From IRWM Guidelines	**y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.**		**2012 IRWM Grant Program Guidelines Source Page(s)**	**Regulatory and/or Other Citations**	**Location of Standard in Grantee IRWM Plan**	**Brief Evaluation Narrative**	**y/n**
Document a governance structure to ensure updates to the IRWM Plan							
The name of the RWMG responsible for implementation of the IRWMP	**y/n**	y	**18/35**	CWC §10539	2.1.1		y
A description of the IRWM governance structure	**y/n**	y	**19/36**		2.5		y
A description of how the chosen form of governance **addresses** and **ensures**:							
Public outreach and involvement processes	**y/n/q**	y	**19/36-37**		2.6, 5.3	Section 2.6.1.1 described various public outreach avenues through GBA. On a regular basis, meeting agendas and minutes are distributed to interested parties, regular attendees and the public via U.S. mail and email. The notifications are also published on the GBA website. Section 5.3 described the DAC outreach strategies and approach.	y
Effective decision making	**y/n/q**	y	**19/37**		2.5.2	The GBA Joint Exercise of Powers Agreement calls for a majority vote of a quorum. A quorum is defined as a majority of the appointed GBA Board of Directors.	y
Balanced access and opportunity for participation in the IRWM process	**y/n/q**	y	**19/37**		2.5.1	The governance of this IRWM group is based on the existing GBA structure and governance. JPA and membership fees help the mutual interest-based groups to achieve their objectives.	Y
Effective communication – both internal and external to the IRWM region	**y/n/q**	y	**19/37-38**		2.6	Section 2.6 described the internal and external communication approaches. The GBA is funded by member contributions and through a special revenue fund that is established for purposes of water planning in the County. Steady funding provides continued support for the stakeholder and public outreach program.	y
Long term implementation of the IRWM Plan	**y/n/q**	y	**19/38**	§10540, §10541	16.2, 16.2.3	The 57 actions listed in Section 16.2 constitute the GBA's plan and commitment to implement the 2014 IRWMP. Long-term planning includes Vulnerability Assessment, Review Land Use Plans, Identify Future Water Supplies and Regular Updates.	y
Coordination with neighboring IRWM efforts and State and federal agencies	**y/n/q**	y	**19/38**		2.6.2, 14		y
The collaborative process(es) used to establish plan objectives	**y/n/q**	y	**19/38**		2.3.3, 7.4	The Mission of the GBA is to employ a consensus-based approach to collaboratively develop stakeholder- supported projects and programs that mitigate and prevent the impacts of long-term groundwater supply-demand imbalance. Managing the underlying groundwater basin is critical in providing reliable water supplies, which are essential for the economic, social, and environmental viability of the San Joaquin Region. Developing an IRWMP is fundamental to carrying out this Mission. The objective for the IRWM Plan was developed by the GBA to address the underlying issues listed above, consistent with the Plan Purpose.	y

DRAFT

IRWM Plan Standard: Governance						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Regulatory and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
How interim changes and formal changes to the IRWM Plan will be performed	y/n/q	y	19/38		16.2.3.4		y
Updating or amending the IRWM Plan	y/n/q	y	19/38		16.2.3.4	GBA will perform a comprehensive review, revision, and adoption of the Integrated Regional Water Management Plan at least every five years. The performance of implemented projects will be compared to original project objectives to ensure objectives were met.	y
Publish NOI to prepare/update the plan; adopt the plan in a public meeting	y/n/q	N	35	CWC §10543		Not clear how the governance structure ensures a notice of intent to prepare/update the plan and that the plan is adopted in a public meeting. Section 2.2 provides some history that a resolution to update the plan was approved at a public meeting in 2011. However, this statement is not clear on the use of an NOI prior to the public meeting and no other process to be used in future updates was found.	N

DRAFT

IRWM Plan Standard: Region Description						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
If applicable, describe and explain how the plan will help reduce dependence on the Delta supply regionally	y/n	N	20	--		Based on Section 9.4.1 and 10.3.35, it is not clear that the IRWM plan will help reduce dependence on the Delta for water supply.	N
Describe watersheds and water systems	y/n	y	19/39	PRC §75026.(b)(1) and CWP Update 2009	4.1		y
Describe internal boundaries	y/n	y	19/39	--	2.10.2, 2.11, 2.12, 4.1		y
Describe water supplies and demands for minimum 20 year planning horizon	y/n	y	19/39	--	6.2, 6.3, 6.4.2		y
Describe water quality conditions	y/n	y	19/40	--	6.5.5, 6.5.6, 6.8, 8.1.6, 15.7		y
Describe social and cultural makeup, including specific information on DACs and tribal communities in the region and their water challenges.	y/n/q	Y	19/40	--	4.2., 5.1.1	Disadvantaged Community areas are located in major portions of Thornton and Walnut Grove; areas located in the central and eastern portions of the City of Lodi; neighborhoods in the City of Stockton mostly located in central and eastern regions; throughout eastern Lathrop; and southeastern Manteca. No mention of Tribal water challenges.	y
Describe major water related objectives and conflicts *	y/n/q	y	19/40	§10541. (e)(3)	2.3.3, 3.3.1, 6.4.1		y
Explain how IRWM regional boundary was determined and why region is an appropriate area for IRWM planning.	y/n/q	y	19/40	--	4.4.1	The region and its authority is determined by two factors: Magnitude of water supply and groundwater management challenges; Practical limit to a regional group.	y
Describe neighboring and/or overlapping IRWM efforts	y/n	y	19/40	--	3.3, 4.5.2, 14		y
Explain how opportunities are maximized (e.g. people at the table, natural features, infrastructure) for integration of water management activities	y/n	N	38	--		Opportunities to maximize integration are not clearly addressed.	N

* Requirement must be addressed.

DRAFT

IRWM Plan Standard: Objectives						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Qualitative Narrative	y/n
Through the objectives or other areas of the plan, the 7 items on pg 41 of GL are addressed.*	y/n	y	20/40 - 41	§10540.(c)	7.4, 6.8	The Plan focuses on the four established objectives of GBA though all 7 items are considered in various sections of the Plan.	y
Describe the collaborative process and tools used to establish objectives: - How the objectives were developed - What information was considered (i.e., water management or local land use plans, etc.) - What groups were involved in the process - How the final decision was made and accepted by the IRWM effort	y/n	y	20/41	--	2.3, 7.4	The GBA has employed a consensus-based approach in its goal. It is not clear how the objectives of GBA, accepted as the IRWMP objectives, are vetted through public process involving non GBA members.	y
Identify quantitative or qualitative metrics and measureable objectives: Objectives must be measurable - there must be some metric the IRWM region can use to determine if the objective is being met as the IRWM Plan is implemented. Neither quantitative nor qualitative metrics are considered inherently better. *	y/n/q	y	20/41 - 42	10541.(e)	7.6, 7.7, 12.3, 12.4	Evaluation criteria (or "Performance Measures") were developed to screen and select the best combinations of projects and management actions that address key water issues using a systems approach for IRWMP implementation.	y
Explain how objectives are prioritized or reason why the objectives are not prioritized	y/n/q	y	20/42-43	--	12.4.2	Prioritization was based on need of project, feasibility, readiness to proceed and public and stakeholder acceptance.	y
Reference specific overall goals for the region: RWMGs may choose to use goals as an additional layer for organizing and prioritizing objectives, or they may choose to not use the term at all.	y/n	N	43	--		A discussion of the goals of the region is not presented.	N

* Requirement must be addressed.

DRAFT

IRWM Plan Standard: Resource Management Strategies (RMS)						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Identify RMS incorporated in the IRWM Plan: Consider all California Water Plan (CWP) RMS criteria (29) listed in Table 3 from the CWP Update 2009 *	**y/n**	y	**20/43**	CWP Update 2009 Volume II; 10541(e)(1)	9.3	A list of RMS to be implemented by the Plan are defined in Table 9-1.	y
Consideration of climate change effects on the IRWM region must be factored into RMS	**y/n**	N	**20/43**	--		The RWMG conducted vulnerability analysis but the plan is not clear how these effects were considered in the selection of applicable RMS.	N
Address which RMS will be implemented in achieving IRWM Plan Objectives	**y/n**	y	**44**	--	9.3, 9.5	Table 9-3 provides a summary of projects, linkage to management objectives and RMS. The plan does not state how the management objectives link to IRWMP objectives.	y

* Requirement must be addressed.

DRAFT

IRWM Plan Standard: Integration						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Contains structure and processes for developing and fostering integration [1]: - Stakeholder/institutional - Resource - Project implementation	y/n/q	y	20/44 - 45	§10540.(g); §10541.(h)(2)	14	Chapter 14 discussed inter-regional coordination and collaboration with Mokelumne River Basin, Sacramento County and Stanislaus County stakeholders	y

1. If not included as an individual section use Governance, Project Review Process, and Data Management Standards per November 2012 Guidelines, p. 44.

DRAFT

IRWM Plan Standard: Project Review Process						Overall Standard Sufficient	Yes
Requirement	**Included**		**Plan Standard Source**		**Evidence of Sufficiency**		**Sufficient**
From IRWM Guidelines	**y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.**		**2012 IRWM Grant Program Guidelines Source Page(s)**	**Regulatory and/or Other Citations**	**Location of Standard in Grantee IRWM Plan**	**Brief Evaluation Narrative**	**y/n**
Process for projects included in IRWM plan must address 3 components: - procedures for submitting projects - procedures for reviewing projects - procedures for communicating lists of selected projects	**y/n**	y	**20/45**	§75028.(a)	9.5 and 12.4		y
Does the project review process in the plan incorporate the following factors:							
How a project contributes to plan objectives	**y/n**	y	**20**		7.4, 7.6, 9.5, 12.3	Performance measures are not directly linked to Plan objectives.	y
How a project is related to Resource Management Strategies identified in the plan.	**y/n**	y	**20**		9.3, 9.5, 10		y
The technical feasibility of a project.	**y/n**	y	**20**		9.5, 12.3.1		y
A projects specific benefits to a DAC water issue.	**y/n**	y	**20**		5, 10		y
Environmental Justice considerations.	**y/n**	N	**20**			Environmental Justice considerations are not included in the Project Review Process.	N
Project costs and financing	**y/n**	y	**20**		10, 11, 12.3		y
Address economic feasibility	**y/n**	y	**21**		10, 11, 12.3		y
Project status	**y/n**	y	**21**		10, 11, 12.3		y
Strategic implementation of plan and project merit	**y/n**	y	**21/48**		12.3, 12.4		y
Project's contribution to climate change adaptation	**y/n**	y	**21**		12.3, 15		y
Contribution of project in reducing GHGs compared to project alternatives	**y/n**	y	**21**		12.3		y
Status of the Project Proponent's IRWM plan adoption	**y/n**	N	**21**			Project proponent's plan adoption status is not considered in the Project Review Process.	N
Project's contribution to reducing dependence on Delta supply (for IRWM regions receiving water from the Delta).	**y/n**	N	**21**			Project's contribution to reducing reliance on the Delta is not considered in the Project Review Process.	N

DRAFT

IRWM Plan Standard: Impact and Benefit						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Discuss potential impacts and benefits of plan implementation within IRWM region, between regions, with DAC/EJ concerns and Native American Tribal communities	**y/n**	y	**21**	--	12.1, 12.2, 12.3	Described a modeling approach for comparing performance of projects and management alternatives.	y
State when a more detailed project-specific impact and benefit analysis will occur (prior to any implementation activity)	**y/n**	N	**49**	--		A discussion of when a more detailed project-specific impact and benefit analysis will occur is not presented.	N
Review and update the impacts and benefits section of the plan as part of the normal plan management activities	**y/n**	y	**50**	--	16.2.3.4	Discussed Plan update every five years	y

DRAFT

IRWM Plan Standard: Plan Performance and Monitoring						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Contain performance measures and monitoring methods to ensure that IRWM objectives are met *	y/n	y	21/53	PRC §75026.(a)	16.2.1, 16.2.3.4, ES. 16.3.1		y
Contain a methodology that the RWMG will use to oversee and evaluate implementation of projects.	y/n	y	21/53		16.2.1, 16.2.5, 16.2.6		Y

* Requirement must be addressed.

DRAFT

IRWM Plan Standard: Data Management						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Regulatory and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Describe data needs within the IRWM region	**y/n**	y	**54**	--	16.2.1		y
Describe typical data collection techniques	**y/n**	y	**54**	--	16.2.1		y
Describe stakeholder contributions of data to a data management system	**y/n**	y	**54**	--	16.2.1		y
Describe the entity responsible for maintaining data in the data management system	**y/n**	y	**54**	--	4.3.4		y
Describe the QA/QC measures for data	**y/n**	n	**54**	--		Data management QA/QC measures are not discussed.	N
Explain how data collected will be transferred or shared between members of the RWMG and other interested parties throughout the IRWM region, including local, State, and federal agencies *	**y/n**	y	**54**	--	4.3.4		y
Explain how the Data Management System supports the RWMG's efforts to share collected data	**y/n**	y	**54**	--	16.2.1.7		y
Outline how data saved in the data management system will be distributed and remain compatible with State databases including CEDEN, Water Data Library (WDL), CASGEM, California Environmental Information Catalog (CEIC), and the California Environmental Resources Evaluation System (CERES).	**y/n**	y	**54**	--	16.2.1		y

* Requirement must be addressed.

DRAFT

IRWM Plan Standard: Finance						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Include a programmatic level (i.e. general) plan for implementation and financing of identified projects and programs* including the following:	y/n	y	21		2.9, 16.2.7, 16.4		y
List known, as well as, possible funding sources, programs, and grant opportunities for the development and ongoing funding of the IRWM Plan.	y/n	y	21		16.2.7		y
List the funding mechanisms, including water enterprise funds, rate structures, and private financing options, for projects that implement the IRWM Plan.	y/n	y	21	§10541.(e)(8)	16.4		y
An explanation of the certainty and longevity of known or potential funding for the IRWM Plan and projects that implement the Plan.	y/n	y	21		16.4		y
An explanation of how operation and maintenance (O&M) costs for projects that implement the IRWM Plan would be covered and the certainty of operation and maintenance funding.	y/n	n	21			A discussion of O&M funding is not presented.	N

* Requirement must be addressed.

DRAFT

IRWM Plan Standard: Technical Analysis						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Document the data and technical analyses that were used in the development of the plan *	y/n	y	22	--	1.1.1, 2.10, 3.1, 3.3, 3.4, 4.2, 6, 8.4, 9.4, 10, 11, 12.2, 13, 15, 17		y

* Requirement must be addressed.

DRAFT

IRWM Plan Standard: Relation to Local Water Planning						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Identify a list of local water plans used in the IRWM plan	y/n	y	22	§10540.(b)	1.1.1, 2.10, 3.1, 3.3, 3.4, 4.2, 6, 9.4, 10, 11, 12.2, 14, 17		y
Discuss how the plan relates to these other planning documents and programs	y/n	y	22		1.1.1, 2.10, 3.1, 3.3, 3.4, 4.2, 6, 9.4, 10, 11, 12.2, 14, 17		y
Describe the dynamics between the IRWM plan and other planning documents	y/n	y	22		1.1.1, 2.10, 3.1, 3.3, 3.4, 4.2, 6, 9.4, 10, 11, 12.2, 14, 17		y
Describe how the RWMG will coordinate its water mgmt planning activities	y/n	y	58		16.2.1.3, 16.2.3		y

DRAFT

IRWM Plan Standard: Relation to Local Land Use Planning						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Document current relationship between local land use planning, regional water issues, and water management objectives	y/n	y	22/59 - 62	--	2.6.1.4, 2.11, 2.12, 3.5, 4.2.1, 6.2, 6.3, 11.2, 16.2.1.3, 16.2.1.4, 16.2.3.2, 16.2.4.3		y
Document future plans to further a collaborative, proactive relationship between land use planners and water managers	y/n	y	22/59 - 62	--	2.6.1.4, 2.11, 2.12, 3.5, 4.2.1, 6.2, 6.3, 11.2, 16.2.1.3, 16.2.1.4, 16.2.3.2, 16.2.4.3		y

DRAFT

IRWM Plan Standard: Stakeholder Involvement						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Contain a public process that provides outreach and opportunity to participate in the IRWM plan *	y/n	y	22/63	§10541.(g)	2.1, 2.5, 2.6, 3.3, 3.4, 4.5.1, 5, 7.4, 8.1, 9.5, 11, 1, 12.2, 12.3, 13.1, 14.1.4, 14.1.9, 16.2.6, 16.2.8		y
Identify process to involve and facilitate stakeholders during development and implementation of plan regardless of ability to pay; include barriers to involvement *	y/n	y	64	§10541.(h) (2)	2.1, 2.5, 2.6, 3.3, 3.4, 4.5.1, 5, 7.4, 8.1, 9.5, 11, 1, 12.2, 12.3, 13.1, 14.1.4, 14.1.9, 16.2.6, 16.2.8	Chapter 5 identifies a method for involving DACs in the IRWM process although it does not specifically identify barriers or complications with ability to pay although contributions are voluntary according to Section 2.5.2.	y
Discuss involvement of DACs and tribal communities in the IRWM planning effort	y/n	y	23	--	5	The plan discusses DAC involvement and states that "No Tribal entities identified in the Plan area". However, the plan does not state how they determined that tribal communities were not present in the region.	N
Describe decision-making process and roles that stakeholders can occupy	y/n	y	23	--	2.5.2, 2.6, 3.3, 9.5, 14.1.4, 14.1.9, 16.2.6, 16.2.8	Stakeholders can participate via their local agencies in the decision making process.	Y
Discuss how stakeholders are necessary to address objectives and RMS	y/n	y	23	--	2.3.3, 16.2.6		y
Discuss how a collaborative process will engage a balance in interest groups	y/n	y	23	--	2.1, 2.3.3, 2.5, 4.5, 7.4, 9.1, 14		y

* Requirement must be addressed.

DRAFT

IRWM Plan Standard: Coordination						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Identify the process to coordinate water management projects and activities of participating local agencies and stakeholders to avoid conflicts and take advantage of efficiencies *	y/n	y	23/65	§10541.(e)(13)	2.1, 2.5, 2.6, 4.5.1		y
Identify neighboring IRWM efforts and ways to cooperate or coordinate, and a discussion of any ongoing water management conflicts with adjacent IRWM efforts	y/n	y	23/65	--	2.6.2, 4.5.2, 14		y
Identify areas where a state agency or other agencies may be able to assist in communication or cooperation, or implementation of IRWM Plan components, processes, and projects, or where State or federal regulatory decisions are required before implementing the projects.	y/n	y	23	--	2.6.2, 10, 11, 12		y

* Requirement must be addressed.

DRAFT

IRWM Plan Standard: Climate Change						Overall Standard Sufficient	Yes
Requirement	Included		Plan Standard Source		Evidence of Sufficiency		Sufficient
From IRWM Guidelines	y/n - Present/Not Present in the IRWMP. If y/n/q qualitative evaluation needed.		2012 IRWM Grant Program Guidelines Source Page(s)	Legislative Support and/or Other Citations	Location of Standard in Grantee IRWM Plan	Brief Evaluation Narrative	y/n
Evaluate IRWM region's vulnerabilities to climate change and potential adaptation responses based on vulnerabilities assessment in the DWR Climate Change Handbook for Regional Water Planning *	y/n	y	23/66 - 73	Climate Change Handbook vulnerability assessment: http://www.water.ca.gov/climatechange/CCHandbook.cfm; November 2012 Guidelines Legislative and Policy Context, p. 66 §10541.(e)(11)	Vulnerabilities in Section 15.7 Adaptation in Section 16.2.9 & ES 17.2		y
Provide a process that considers GHG emissions when choosing between project alternatives *	y/n	Y	23/68		Section 16.2.5 and 16.2.9	While sufficently addressed, the plan would benefit from a more robust discussion of how a GHG emissions as part of the project selection process.	Y
Include a list of prioritized vulnerabilities based on the vulnerability assessment and the IRWM's decision making process.	y/n	y	23/66 - 73		Section 15.7		y
Contain a plan, program, or methodology for further data gathering and analysis of prioritized vulnerabilities	y/n	y	23/66 - 73		Section 16.2.9		y
Include climate change as part of the project review process	y/n	N	23/68			Section 16.2.5 includes a statement that GHGs will be evaluated, but it is unclear how it will be considered during the review process; adaptation partially addressed (Table 7-1) but limited to flood scenarios in the review process	N

* Requirement must be addressed.

DRAFT

Regulatory Citation	Link	Notes
IRWM Prop 84 and 1E Guidelines	http://www.water.ca.gov/irwm/grants/docs/Guidelines/GL_2012_FINAL.pdf	DWR November 2012 Guidelines - Final
CWC §10539	http://www.leginfo.ca.gov/cgi-bin/displaycode?section=wat&group=10001-11000&file=10532-10539	
CWC §10540, §10541	http://www.leginfo.ca.gov/cgi-bin/displaycode?section=wat&group=10001-11000&file=10540-10543	
CWC §10543	http://www.leginfo.ca.gov/cgi-bin/displaycode?section=wat&group=10001-11000&file=10540-10543	
PRC §75026, §75028, CWP Update 2009, and California Watershed Portal	http://www.leginfo.ca.gov/cgi-bin/displaycode?section=prc&group=75001-76000&file=75020-75029.5	The Department of Water Resources shall give preference to proposals that satisfy the criteria specified in PRC §75026.(b)(1). §75028.(a) - the department shall defer to approved local project selection, and review projects only for consistency with the purposes of Section 75026.
	http://www.waterplan.water.ca.gov/cwpu2009/index.cfm	2009 California Water Plan Volumes I and II
	http://www.conservation.ca.gov/dlrp/watershedportal/Pages/Index.aspx	California Watershed Portal
§10541. (e)(3)	http://www.leginfo.ca.gov/cgi-bin/displaycode?section=wat&group=10001-11000&file=10540-10543	