

DEPARTMENT OF WATER RESOURCES

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August 15, 2014

Mr. Mark Larson
Kaweah Delta Water Conservation District
2975 N. Farmersville Blvd.
Farmersville, California 93223

Kaweah Delta Water Conservation District Integrated Regional Water Management
Plan Draft Review

Dear Mr. Larson:

Attached please find the Department of Water Resources (DWR) draft review of the Kaweah Delta Water Conservation District Integrated Regional Water Management (IRWM) Plan. Based on our review, the Kaweah Delta Water Conservation District IRWM Plan is not consistent with the IRWM Planning Act and the related IRWM Plan Standards contained in the 2012 IRWM Grant Program Guidelines because of issues related to the Governance, Objectives, Resource Management Strategies, Project Review Process, Impacts and Benefit, Plan Performance and Monitoring, Finance, Technical Analysis, Stakeholder Involvement and Climate Change standards.

DWR encourages you to contact the person below to discuss the draft review and possible follow-up. It is incumbent on the Regional Water Management Group to respond in a timely manner as the Plan Review Process does not exempt the IRWM region from compliance with external deadlines and requirements, such as application due dates or provisions of existing grant agreements.

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>.

If you have any questions, please contact Craig Cross at (916) 651-9204 or Craig.Cross@water.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Tracie L. Billington".

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 eligibility 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 Guidelines.

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 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: Kaweah River Basin IRWM Region

Regional Water Management Group: Kaweah River Basin RWMG
 IRWM Plan Title: Kaweah River Basin IRWMP

ONE OR MORE PLAN STANDARDS NOT SUFFICIENT

IRWM Plan Standard	Overall Standard Sufficient	Requirement(s) Insufficient
Governance	No	See Governance Standard
Region Description	Yes	
Objectives	No	See Objectives Standard
Resource Management Strategies	No	See Resource Management Strategies
Integration *	Yes	
Project Review Process	No	See Project Review Process Standard
Impact and Benefit	No	See Impacts and Benefit Standard
Plan Performance and Monitoring	No	See Plan Performance and Monitoring Standard
Data Management	Yes	
Finance	No	See Finance Standard
Technical Analysis	No	See Technical Analysis Standard
Relation to Local Water Planning	Yes	
Relation to Local Land Use Planning	Yes	
Stakeholder Involvement	No	See Stakeholder Involvement Standard
Coordination	Yes	
Climate Change	No	See Climate Change Standard

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

Additional Comments:

Recommendations to meet Climate Change Standard: This IRWMG needs to evaluate their vulnerabilities using the Vulnerabilities Checklist in the DWR CC Handbook, or utilize an equivalent evaluation of the breadth of potential impacts from climate change the region might experience. Resources such as the Handbook, Cal-Adapt, the 2009 Climate Adaptation Strategy are all valuable for assessing vulnerabilities and identifying adaptation and mitigation strategies. A mechanism for including considerations of mitigation and adaptation also needs to be incorporated into the project review and selection process. The DWR Regional Climate Change Specialist is available to assist the group with developing these parts of the IRWM Plan.

IRWM Plan Standard: Governance					Overall Standard Sufficient	No	
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		Section 2.1.1 (p. 24)		Y
A description of the IRWM governance structure	y/n	Y	19/36	CWC §10539	Section 2.1-2.3 Table 2.1 and Figure 2-1, Section 9.1.1		Y
A description of how the chosen form of governance addresses and ensures :							
Public outreach and involvement processes	y/n/q	q	19/36-37		Section 12.4	Section 12.4 discusses the public stakeholder outreach to include meetings open to the public, an electronic listserv of meeting information and related items, a regional website, and publication of a quarterly newsletter for educating the public on water conservation and integrated regional water management. Targeted outreach occurs for vital stakeholders that are identified as needing to participate or are known to be affected by or part of a specific project.	Y
Effective decision making	y/n/q	q	19/37			Section 2.1.3 discusses the "deemed equivalent" IRWMP of the KDWCD that has been in effect for 20 years and how a final Plan will be submitted to DWR for the 2012 Guidelines review; however, they are submitting this "intermediary" Plan that is not complete. As this review is the 2012 Guideline review, this text is confusing. Is this the intermediary or the final Plan? Section 3.3.2 discusses the decision making process being in accordance with the structure of the "deemed equivalent" IRWMP; however, there is no discussion on what the effective decision making process is for the Region.	N
Balanced access and opportunity for participation in the IRWM process	y/n/q	q	19/37		Section 2.2.1 and 3.3.6	The Stakeholder Advisory Group appears to be balanced and the recent incorporating of agencies such as the Community Water Center and Self-Help Enterprises should continue to assist the balanced access and opportunity for participation within the disadvantaged communities in the area.	Y
Effective communication – both internal and external to the IRWM region	y/n/q	q	19/37-38	§10540, §10541	Section 12.4.5	Plan discuss communicating with DWR, the Bureau, and USACE with respect to day-to-day storage and flow release coordination in Section 12.4.5; however, there is no specific reference to effective communication within and external to the IRWM region.	Y

IRWM Plan Standard: Governance				Overall Standard Sufficient		No	
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
Long term implementation of the IRWM Plan	y/n/q	q	19/38		Section 14.4	Chapter 10 has many references to implementation of projects, but there is no specific reference to the implementation of the Plan. Also, 14.4 is called IRWMP Implementation, but it does not discuss how the existing governance structure will address and ensure long term implementation of the plan.	N
Coordination with neighboring IRWM efforts and State and federal agencies	y/n/q	q	19/38		Sections 2.2.3-2.2.5, 3.3.4, and 12.4.5	Sections 2.2.3-2.2.5 discuss the coordination efforts with the local agencies through the Tule River Basin Plan development and the Southern Sierra Plan development. There is also a discussion of the JPA that was formed with water-related entities in the Tulare Lake Hydrologic Region to work on a broader regional level - for evaluating the inter-regional project potential. Section 3.3.4 discusses the cooperation and coordination efforts with the Kings River Basin IRWM Region. 12.4.5 discusses the coordination with USACE, USFW, State Lands Commission, and the CVFPB.	y
The collaborative process(es) used to establish plan objectives	y/n/q	q	19/38		Section 3.1 and 12.1	Section 3.1 "the objectives...were formulated in the multiple meetings of the Kaweah River Basin IRWMP Stakeholder Advisory Group meetings...these objectives have been ratified, over time, by the Board of Directors of the KDWCD." -	y
How interim changes and formal changes to the IRWM Plan will be performed	y/n/q	q	19/38			A clear discussion of how Interim and formal changes to the plan is not included.	N
Updating or amending the IRWM Plan	y/n/q	q	19/38			How the plan will be updated has not been determined.	N
Publish NOI to prepare/update the plan; adopt the plan in a public meeting	y/n/q	q	35	CWC §10543		Section 2.1.1 states "KDWCDC has provided formal notice to the public and agencies of jurisdiction of the preparation of an IRWMP..." However, it is not clear if this notices resulted in the adoption of the plan in a public meeting.	N

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	--		Groundwater is their principal source of water supply for the entire Kaweah River Basin; one of their objectives is to protect and improve water resources such as flows of the Kaweah River, sustaining historic levels of importation of Friant Division, CVP supplies...; no discussion specific to reducing dependence on the Delta supply regionally. Section 15.3.3 states the nexus with the Delta will be discussed in the Round 2 planning grant process.	N
Describe watersheds and water systems	y/n	y	19/39	PRC §75026.(b)(1) and CWP Update 2009	Section 4.1-4.2, and 4.7		y
Describe internal boundaries	y/n	y	19/39	--	Section 4.1 and Figures 4-1 and 4-2 (page 112-113)		y
Describe water supplies and demands for minimum 20 year planning horizon	y/n	n	19/39	--		Section 6.5 discusses groundwater and surface water supplies and the "entitlement holders" in Table 6-8. Section 6.6 discusses the water users and estimates their consumption. No mention of a 20 year planning horizon, or any period for that matter.	N
Describe water quality conditions	y/n	y	19/40	--	Sections 7.1-7.3		y
Describe social and cultural makeup, including specific information on DACs and tribal communities in the region and their water challenges.	y/n/q	q	19/40	--		The plan does not include a specific discussion on the social and cultural makeup, including DACs and tribal communities in the region and their water challenges.	N
Describe major water related objectives and conflicts *	y/n/q	q	19/40	§10541. (e)(3)	Section 9.1 and 9.3	One major water-related issue is who will be serving in the governance leadership role for the IRWMP. Climate change is the next big issue that they have not yet been able to fully evaluate. Also, land use planning conflicts with water quality/supply as housing development continues without consideration of the prevalence or quality of water supplies.	y
Explain how IRWM regional boundary was determined and why region is an appropriate area for IRWM planning.	y/n/q	q	19/40	--	Section 4.1	Regional boundary appropriateness is discussed.	y

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
Describe neighboring and/or overlapping IRWM efforts	y/n	y	19/40	--	Section 2.2 and 3.3.4 and Figure 4-2	Sections 2.2.3-2.2.5 discuss the coordination efforts with the local agencies through the Tule River Basin Plan development and the Southern Sierra Plan development. There is also a discussion of the JPA that was formed with water-related entities in the Tulare Lake Hydrologic Region to work on a broader regional level - for evaluating the inter-regional project potential. Section 3.3.4 discusses the cooperation and coordination efforts with the Kings River Basin IRWM Region. They share a Stakeholder Advisory Group with the Tule River Basin IRWM.	y
Explain how opportunities are maximized (e.g. people at the table, natural features, infrastructure) for integration of water management activities	y/n	y	38	--	Section 3.3.2, Section 9.5, Chapter 12, and Chapter 13		y

* Requirement must be addressed.

IRWM Plan Standard: Objectives					Overall Standard Sufficient	No	
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)	Section 3.1	17 Plan Objectives are discussed in Section 3.1	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	--	Section 3.1		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	q	20/41 - 42	10541.(e)		There is no established quantitative or qualitative metric or method for measuring and evaluating the objectives.	N
Explain how objectives are prioritized or reason why the objectives are not prioritized	y/n/q	q	20/42-43	--		The objectives are not prioritized so that they can be flexible with new funding and partnership opportunities.	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	y	43	--	Section 3.1.4	One of the objectives discusses the specific goals within the Kaweah River Corridor structure include water management, habitat restoration, and storm water control; however, this is not for the entire IRWMP.	Y

* Requirement must be addressed.

IRWM Plan Standard: Resource Management Strategies (RMS)					Overall Standard Sufficient	No	
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	n	20/43	CWP Update 2009 Volume II; 10541(e)(1)		Section 9.4 states "The specific delineation of RMS strategies as a separate and divided portion of the IRWMP document structure is to be addressed in supplemental fashion to this document in Round 2 planning efforts." Section 15.3.3 also discusses the RMS as something that will be examined during the Round 2 planning grant write-up and process.	N
Consideration of climate change effects on the IRWM region must be factored into RMS	y/n	n	20/43	--		The plan does not consider the climate change effects or RMS.	N
Address which RMS will be implemented in achieving IRWM Plan Objectives	y/n	n	44	--		The plan does not discuss implementing RMS until Section 15.3.3 when they discuss the Round 2 planning grant process.	N

* Requirement must be addressed.

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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 : <ul style="list-style-type: none"> - Stakeholder/institutional - Resource - Project implementation 	y/n/q	q	20/44 - 45	§10540.(g). §10541.(h)(2)	Section 3.3.2, 13.2, and 13.3	Section 3.3.2 contains a short discussion of the integration that has occurred historically through governance, stakeholder outreach, data management, and project review or selection processes. Generally, there is a lot of resource integration within this area and coordination occurs with multiple state and federal agencies. Sections 13.2 and 13.3 also discuss the evaluation of integration potential between projects during the project review and prioritization process.	y

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

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IRWM Plan Standard: Project Review Process					Overall Standard Sufficient	No	
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		Section 13.2		y
Does the project review process in the plan incorporate the following factors:							
How a project contributes to plan objectives	y/n	n	20			There's no connection with the Plan objectives and projects that would implement the plan.	N
How a project is related to Resource Management Strategies identified in the plan.	y/n	n	20			The project review does not examine the projects to the RMS identified in the Plan because the Plan does not discuss the RMS.	N
The technical feasibility of a project.	y/n	n	20			There is no discussion of needing a technical analysis or feasibility study prior to project proposal or as a component to project evaluation.	N
A projects specific benefits to a DAC water issue.	y/n	N	20			The Plan's project review Section 13.2 does not discuss or evaluate the specific benefits to a DAC water issue. Appendix K is titled the "Proposed DAC Scoring Criteria for IRWMP Projects", but it's unclear if this proposed criteria is a part of the plan review process.	N
Environmental Justice considerations.	y/n	n	20			Environmental Justice considerations are not part of the project review process.	N
Project costs and financing	y/n	N	20	§75028.(a)		While "Total Project Cost" and "Total Project Cost in Comparison to Proposed Cost Sharing Amount" are requested from project proponents, project financing is not discussed.	N
Address economic feasibility	y/n	N	21			The plan does not sufficiently address economic feasibility.	N
Project status	y/n	y	21		Section 13.2	Possibly captured in the "Readiness to Proceed" filter during project screening, but no elaboration provided.	y
Strategic implementation of plan and project merit	y/n	N	21/48			Since there is no correlation between the Plan objectives and the project review and prioritization, it does not appear that project merit is examined and reinforced by the strategic implementation of the Plan.	N
Project's contribution to climate change adaptation	y/n	n	21			Section 13.2 includes the filter for project screening of "climate change relationship", but there is no elaboration as to what that means. The fact that climate change impacts and variables to the Region has not been considered yet makes it seem that they likely are not analyzing the project's contribution to climate change adaptation.	N

IRWM Plan Standard: Project Review Process					Overall Standard Sufficient	No	
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
Contribution of project in reducing GHGs compared to project alternatives	y/n	n	21			There is no discussion of examining a project's contribution to reducing GHGs.	N
Status of the Project Proponent's IRWM plan adoption	y/n	n	21			There is no mention of a project proponent adopting the IRWM Plan.	N
Project's contribution to reducing dependence on Delta supply (for IRWM regions receiving water from the Delta).	y/n	n	21			Not mentioned until Section 15.3.3 as a proposed item that will be examined during the Round 2 planning grant write-up and process.	N

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IRWM Plan Standard: Impact and Benefit					Overall Standard Sufficient	No	
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	n	21	--		Section 14.3 lists the project-specific impacts that will need to be considered in project development, but there is no elaboration or discussion, and there is no mention of benefits. Potential impacts and benefits of actual Plan implementation within the region, between regions, with DAC/EJ concerns, and Native American Tribal communities are not discussed.	N
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 would occur could not be located.	N
Review and update the impacts and benefits section of the plan as part of the normal plan management activities	y/n	n	50	--		The listed impacts will be considered in project development, but no discussion of reviewing or updating them as part of the Plan management activities. Benefits of the plan are not mentioned.	N

IRWM Plan Standard: Plan Performance and Monitoring					Overall Standard Sufficient	No	
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	n	21/53	PRC §75026.(a)		Section 15.1.1 discusses the "current discussions evolve around the development of performance measures for the IRWMP in addition to those which currently exist". Also, "if it is elected to introduce condition monitoring as a performance measure, it would likely need to be divided into the elements associated with RMS". There is no relationship between the objectives and the performance measures and monitoring methods.	N
Contain a methodology that the RWMG will use to oversee and evaluate implementation of projects.	y/n	n	21/53			Section 15.1.2 attempts to discuss the evaluation capacity of the IRWM group to evaluate and implement projects -- it does not speak directly to the evaluation of implementation projects, but more about evaluating the project development and evaluation process.	N

* Requirement must be addressed.

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	n	54	--		No discussion of data needs within the IRWM region.	N
Describe typical data collection techniques	y/n	n	54	--		There is no specific mention of how they collect the data or how often it's done by each party, but there is discussion of the agencies that obtain the data, or have data to offer.	N
Describe stakeholder contributions of data to a data management system	y/n	y	54	--	Sections 15.2.1 and 15.2.2		Y
Describe the entity responsible for maintaining data in the data management system	y/n	y	54	--	Section 15.2.3		Y
Describe the QA/QC measures for data	y/n	n	54	--		There is no discussion of QA/QC procedures for the data.	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	--	Section 15.2.4		Y
Explain how the Data Management System supports the RWMG's efforts to share collected data	y/n	y	54	--	Section 15.2.1, 15.2.2, and 15.2.4		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	--	Section 15.2.5		Y

* Requirement must be addressed.

IRWM Plan Standard: Finance				Overall Standard Sufficient	No		
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		Section 14.4.2		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		Section 14.4.2		y
List the funding mechanisms, including water enterprise funds, rate structures, and private financing options, for projects that implement the IRWM Plan.	y/n	n	21	§10541.(e)(8)		There is no direct relationship of rate structures or private financing opportunities for projects implementing the Plan.	N
An explanation of the certainty and longevity of known or potential funding for the IRWM Plan and projects that implement the Plan.	y/n	n	21			There is no explanation of the certainty and longevity of known or potential funding for the IRWM Plan and projects that implement the Plan.	N
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			There is no discussion of how O&M funding will be paid for with respect to a specific project or the certainty of the O&M funds existing.	N

* Requirement must be addressed.

IRWM Plan Standard: Technical Analysis					Overall Standard Sufficient	No	
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	n	22	--		Section 15.1 is titled "Technical Analysis and Plan Performance Evaluation"; however, there is no discussion of the technical analyses that were used to develop the plan. Instead, it discusses the very subjective performance measures and monitoring methods proposed for the future.	N

* Requirement must be addressed.

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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)	Section 11.1		y
Discuss how the plan relates to these other planning documents and programs	y/n	y	22		Section 3.3.4, 11.1 and 11.2		y
Describe the dynamics between the IRWM plan and other planning documents	y/n	y	22		Section 11.1 and 11.2.5		y
Describe how the RWMG will coordinate its water management planning activities	y/n	y	58		Section 11.1		y

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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	--	Section 3.1.2		y
Document future plans to further a collaborative, proactive relationship between land use planners and water managers	y/n	y	22/59 - 62	--	Section 3.1.2, 3.2.5, and 9.1.1		y

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IRWM Plan Standard: Stakeholder Involvement					Overall Standard Sufficient	No	
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)	Section 12.4		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	n	64	§10541.(h) (2)		Section 12.4.4 discusses some targeted outreach, but it's solely to participants that are of assistance to the Stakeholder Advisory Group, and it is not apparent there is a process for involving and facilitating stakeholders throughout the plan development -- other than those stakeholders that were necessary (e.g., KDWCD, SAG). Sections 12.4.7 discusses the future program for incorporating DACs, but there's not a discussion of the implementation of the plan regardless of the ability to pay. The process for developing and implementing the plan does not appear inclusive. Potential barriers to Plan implementation are discussed in Section 14.4.1, but they seem to be speculative in nature.	N
Discuss involvement of DACs and tribal communities in the IRWM planning effort	y/n	y	23	--	Sections 12.4.7 and 12.4.8		y
Describe decision-making process and roles that stakeholders can occupy	y/n	y	23	--	Section 3.3.2		Y
Discuss how stakeholders are necessary to address objectives and RMS	y/n	y	23	--	section 12.1		y
Discuss how a collaborative process will engage a balance in interest groups	y/n	y	23	--	Section12		y

* Requirement must be addressed.

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)	Sections 12.4.1, 12.4.5, and 15.1.2		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	--	Sections 2.2.3-2.2.5,		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	--	Section 12.4.5		y

* Requirement must be addressed.

IRWM Plan Standard: Climate Change					Overall Standard Sufficient	No	
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	n	23/66 - 73	Climate Change Handbook vulnerability assessment:			N
Provide a process that considers GHG emissions when choosing between project alternatives *	y/n	n	23/68	http://www.water.ca.gov/climatechange/CCHandbook.cfm ;			N
Include a list of prioritized vulnerabilities based on the vulnerability assessment and the IRWM's decision making process.	y/n	n	23/66 - 73	November 2012 Guidelines Legislative and Policy Context, p. 66			N
Contain a plan, program, or methodology for further data gathering and analysis of prioritized vulnerabilities	y/n	n	23/66 - 73				N
Include climate change as part of the project review process	y/n	n	23/68	§10541.(e)(11)			N

* Requirement must be addressed.

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	