



July 29, 2014

Ted Daum & Craig Cross  
California Department of Water Resources (DWR)  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
Post Office Box 942836  
Sacramento, CA 94236-0001

Subject: North Coast Integrated Regional Water Management Plan, Phase III revisions

Dear Mr. Daum and Mr. Cross,

On behalf of the North Coast Resource Partnership (NCRP) leadership, NCRP staff is pleased to submit the following revisions to the North Coast Integrated Regional Water Management Plan, Phase III (NCIRWMP) based on the review comments provided to NCRP staff by Craig Cross on July 25, 2014 and follow up conference call with Joseph Yun, Ted Daum, Craig Cross and NCRP staff, Karen Gaffney and Katherine Gledhill.

DWR review comments are indicated by blue text followed by the proposed additional clarifying text and proposed location in the NCIRWMP (by NCIRWMP Section, page and paragraph).

We appreciate your review and suggested improvements to the NCIRWMP. On behalf of the NCRP Policy Review Panel, we thank you and your colleagues at DWR for your ongoing support and guidance in this process.

---

**[General Comment: The IRWM Plan refers to other documents \(e.g., Project Review and Selection Process Guidelines\) consider stating that such documents are part of the IRWM Plan.](#)**

***Section 1.1 Introduction and Planning Approach, Overview of the NCRP & the NCIRWMP Plan & Process; page 1, after 4<sup>th</sup> paragraph.***

Throughout this NCIRWMP, there is reference to policy and guidance documents (e.g., [Project Review and Selection Process Guidelines](#)) available on the NCIRWMP website (<http://www.northcoastirwmp.net/>). Because the NCRP uses an Adaptive Management approach to

governance, these policies and planning processes are updated and approved by the NCRP PRP on a regular basis that occurs more frequently than NCIRWM Plan updates. The planning documents available online are considered formal NCIRWM planning documents and are referenced where applicable within this document.

**Governance (1): The information provided only describes how formal plan updates are performed. There is no information provided on how interim changes are performed and the process for making those changes.**

***Section 2.5 Governance & Decision-Making, Decision Making Process; page 14, after first paragraph.***

Interim changes to policy are considered on a quarterly basis at NCRP PRP meetings. The Adaptive Management approach necessitates decision-making outside of formal NCIRWM Plan updates; these are approached in the same manner that formal plan updates are approached. Challenges are identified, researched if necessary, discussed and voted on, with consensus the goal, but majority prevailing. See Section 2.5.2 for an example of a decision entertained and resolved outside of the formal NCIRWM Plan review process, but included in the next iteration of the plan.

**Governance (2): No information is presented regarding if an NOI to prepare and adopt the plan was published, and if the plan was or will be adopted in a public meeting.**

***Section 2.7.2 Governance & Decision-Making, NCIRWM Plan Updates; page 18, after first paragraph.***

NCRP RWMG members and Counties adopt each iteration of the NCIRWM Plan at public meetings that have been publicly noticed through various media outlets, such as email, websites, and newspaper notifications. Tribal partners adopt the NCIRWM Plan at Tribal Council meetings which are noticed to their constituents. All counties notice their Board of Supervisors meetings at least 72 hours in advance to comply with Brown Act requirements. Each member County, Tribal Council, and project sponsor is expected to formally and publically adopt the Phase III Plan by September 9<sup>th</sup>, 2014.

**Project Review Process (1): It is not clear how the project review process considers a projects relation to chosen Resource Management Strategies.**

***Section 7.0 Project Application, Review & Selection Process; page 118, final sentence, third paragraph.***

These and other North Coast priorities (Section 1.5) provide the foundation for ongoing refinement of the 2014 NCRP Guidelines. For example, during the most recent review of the NCIRWM Plan, the lack of consideration of Resource Management Strategies (RMS) during project review was noted. The next

iteration of the review process (which occurs prior to a project solicitation) will include each project's relation to pertinent RMS in the project evaluation and prioritization process. For example, when considering projects that increase water supply reliability, those projects that incorporate multiple RMS – such as Agricultural Water Use Efficiency, Surface Storage, and Matching Water Quality to Use – not only enhance the desired water supply reliability but also provide multiple benefits. The stated RMS also strengthen the regional economy, support DACs, protect water quality, and protect environmental beneficial uses such as provision of instream flow for salmonid rearing and migration. These factors are already considered during project prioritization on an informal basis, however, in the future, project application and review will formalize consideration of RMS.

**[Project Review Process \(2\): The factor for EJ considerations seems to be missing from the project review process.](#)**

***Section 7.1.4. Project Application, Review & Selection Process; Priority Considerations, Economically Disadvantaged Community (DAC); page 121, before first paragraph.***

As part of its commitment to respecting the local autonomy and local culture of each NCRP member, the group has opted out of using some common terminology, such as “Environmental Justice,” that can have multiple meanings and may be considered inflammatory to some members. The North Coast is a rural region where economic disparity is the main driver. Thus, there is a strong focus on Severely Economically Disadvantaged Communities and DACs within the region and the PRP has regularly and consistently supported efforts to address economic disparity as the predominant mechanism to address environmental justice. Project review and NCIRWMP Plans consistently and comprehensively address economic disparity through implementation of projects that serve these communities. These projects are regularly weighted as described below.

**[Project Review Process \(3\): The review process does not seem to consider the status of the project proponents IRWM plan adoption.](#)**

***Section 7.3 Project Application, Review & Selection Process; Project Integration with NCIRWMP Planning; page 124, after first paragraph.***

All counties, Tribes, current Proposition 84 project proponents and potential Drought project proponents will adopt the Phase III NCIRWMP by September 9<sup>th</sup>, 2014. For future implementation efforts, project proponents must formally adopt the most recent version of the NCIRWMP prior to or simultaneously with project submission.

[Impact and Benefit: The plan does not address when the impact and benefit section would be reviewed and updated.](#)

***Section 10.2.2 Implementation Impacts and Benefits, Integration of Individual Project Impact/Benefit Analysis; page 152, after first paragraph.***

Results from project monitoring data and impact/benefit analyses will be used on an ongoing basis (at programmatic level) to inform the NCIRWMP goals and objectives and project selection criteria. These data will be memorialized on a regular basis in the NCIRWMP and in project applications. The Implementation Impacts and Benefits Section will be reviewed along with NCIRWMP Goals and Objectives and will be updated as deemed necessary by the TPRC and PRP. Additionally, a Plan Performance webpage documenting impacts and benefits will be developed to include programmatic summary statistics for the region.

[IRWM Plan Standard: Data Management deficiencies.](#)

***Section 13.4, Data Management & Information Sharing, Development & Maintenance of the DMP; page 175 & 176, replace existing text with the following.***

The County of Humboldt will perform overall management of the DMP for the North Coast Region. Roles of NCRP project proponents and NCRP staff, as they relate to project monitoring and data reporting, are outlined in Appendix G “Monitoring Protocols for NCIRWMP Evaluation”.

The DMS will document project benefits through the NCIRWMP website. The NCRP will be launching a new website by mid-September 2014; this will include a Plan Performance page that provides programmatic summary statistics for the region as well as data for individual projects. The Plan Performance page will be updated at least annually and more frequently as needed. This webpage will be distributed to all relevant state agencies. Additionally, on an ongoing basis the North Coast will track statewide databases, evaluate mechanisms for ensuring compatibility with statewide databases, contact relevant state agencies and send information regarding the NCRP and NCIRWMP to relevant state agencies for inclusion in their databases. At all times, the NCRP will maintain open communication channels with state agencies and serve as a conduit where appropriate to disseminate information between local and state/federal levels.

#### ***Project Performance – QA/QC and Benefits***

Each project proponent will develop a Project Performance Monitoring Plan (PPMP) to track project performance. These plans will describe tools used to monitor project performance (see Appendix G for NCIRWMP-approved monitoring protocols chosen for consistency with State Data Clearinghouses such as GAMA, CASGEM, CEDEN, and SWAMP) so that data collected will conform to statewide requirements

for data collection and reporting including units, standardization, and metadata format. The PPMPs will include QA/QC measures; many of the NCIRWMP-approved monitoring protocols provided in Appendix G include QA/QC measures. The plans will also set interim targets to track the project's progress toward meeting the benefits claimed and indicate where and which data will be collected and the types of analyses to be used (based on guidance provided in Appendix G). The PPMPs will also describe and justify monitoring tools and targets and provide a discussion of how monitoring data will be used to measure project performance.

In an effort to avoid duplication of effort and in recognition that most project proponents are DACs with limited resources, statewide data will not be collected at the regional level, but instead, as described above, project proponents will be required in their PPMP to upload relevant information to statewide databases. In addition, the NCIRWMP will require submission of project-specific metrics (see Appendix J, Tables 42 and 45 for the types of metrics most commonly used) as determined from the project application and scope of work. These metrics will be synchronized with other reporting requirements and reported on a regular basis and will document physical benefits for each project as they accrue. Data will be quantitative and will include physical units of measure as provided in detail in Appendix J, Table 45. Examples include: acres of habitat restored, tons of sediment prevented from entering stream system, acre-feet of water per year left instream, number of participants in workshops or programs, number of households with access to improved water supply reliability, etc.

### ***Stakeholder-Identified Topics***

The NCIRWMP process involves extensive outreach and identification of local/regional needs, providing the opportunity for stakeholders to identify issues of local and regional concern. The NCIRWMP website provides background on how such topics have been identified and researched, and how the NCRP has developed strategies to address those needs. For example, the Water & Wastewater Service Provider Outreach and Support Program and Energy Independence and Emissions Reduction Program were identified as growth areas for the NCIRWMP process after widespread outreach throughout the region. These topics are described in detail on the NCIRWMP website, with web pages and associated documentation for each special topic. Future topics will be identified and vetted through the same inclusive, transparent process and will also be researched, documented, and disseminated through the NCIRWMP website.

### ***Data Collection Techniques***

Data collection techniques are varied to capture the widest range of applicable information. The NCIRWMP website allows for ongoing North Coast Project data upload, which allows for continual identification of need in the Region. Project data upload requests such metadata as organization, project type, goals and objectives, statewide priorities addressed, funding status, location, and benefits (see <http://www.northcoastirwmp.net/proj2012/rpf.php>, which allows for project upload after registration to ensure data integrity). Project reporting contributes to statewide databases as described above and also provides quantitative information relevant to plan performance, which will be collected

on a regular basis as described above. Project reporting will include quantitative benefits information relevant to Plan performance evaluation.

Meeting, conference, workshop, and other materials are posted in the Event section of the NCIRWMP website by staff and associated meeting materials are linked with the event in the NCIRWMP resources library. Stakeholders are invited to provide information to staff regarding their organization/event and that information is uploaded. Special topics are identified by stakeholders in the Region as described above. Once identified and determined to constitute a need by a significant number of stakeholders, a topic is researched by NCIRWMP staff with findings presented to the PRP, which decides upon further action, if any. This process and the data it generates is documented during meetings and on special topic web pages as relevant and appropriate.

### ***Data Management and Dissemination***

The data collected through the methods described above will be compiled and disseminated at several levels (see Data Management and Dissemination Task Table, page 1, Appendix G) and all of the data will be made available on the NCIRWMP website through specific pages, such as the Project Benefits page, interactive mapping application or through the North Coast IRWMP Library. This furthers the RWMG's efforts to share collected data by providing the information in an easily accessible website and in multiple ways to ensure the information is available for a wide range of uses and to a variety of interested parties (<http://www.northcoastirwmp.net/docs.php>).

### ***Project Level***

The new website, due for launch in mid-September 2014, will contain a page dedicated to providing benefits information and plan performance measures that highlight achievements in tabular format. Additionally, specific North Coast project data is made available on the website through implementation project posters and information pages and are available at: [http://www.northcoastirwmp.net/Content/10446/North\\_Coast\\_Resource\\_Partnership\\_Project\\_Posters.html](http://www.northcoastirwmp.net/Content/10446/North_Coast_Resource_Partnership_Project_Posters.html). Implementation project videos are available through YouTube links:

- Shasta Water Association & Araujo Dam Restoration projects: <http://www.youtube.com/watch?v=6A2I5kF4sjk>
- Salt River Ecosystem Restoration Project: <http://www.youtube.com/watch?v=D6BoI4peVL4>
- Newell Water System Renovation: <http://www.youtube.com/watch?v=nKnbtYgvLkk>
- Yurok Lower Klamath Restoration: [https://www.youtube.com/watch?v=b3T6G\\_PG-gQ](https://www.youtube.com/watch?v=b3T6G_PG-gQ)
- Lower Mid-Klamath Habitat Protection Road Decommissioning Implementation Project: <https://www.youtube.com/watch?v=XOHLp5cw7Po>
- Gualala River Watershed Council: <https://www.youtube.com/watch?v=wLndRkL5PhI>
- Raw and Recovered Water for Irrigating Public Agencies - Trinity County Waterworks District #1: <https://www.youtube.com/watch?v=05v-hfx-gb4>
- Forsythe Creek Sediment Reduction Program: <https://www.youtube.com/watch?v=NNCzTS8nyDI>

- Mid Van Duzen River Ranch Road Sediment Reduction Program:  
<https://www.youtube.com/watch?v=8xV2Bho-8j0>
- Sonoma County Water Recycling and Habitat Preservation Project Phase 2A:  
<https://www.youtube.com/watch?v=eYUVw6d5tys>

The new NCIRWMP website will also include a web portal that houses and makes public plan performance data and analyses, educational materials; and monitoring and assessment protocols and data sources relevant to the North Coast Region (see Appendix G). Additionally, spatial data will be available through an improved interactive map application that includes project specific data (see existing mapping application at: <http://www.northcoastirwmp.net/Content/10376/map.html>).

#### *Watershed Level*

At the watershed level, data is disseminated through the NCIRWMP website. Each Watershed Management Area has a separate web page containing specific geo-physical information, links to relevant plans and programs, and local watershed groups (e.g., <http://www.northcoastirwmp.net/Content/10301/preview.html>). Additionally, the interactive mapping application provides geographic locations of important features and other pertinent spatial data at the WMA and smaller spatial scales (see: <http://www.northcoastirwmp.net/Content/10376/map.html>).

#### *Regional IRWMP Level*

The website, special handouts, and meetings, workshops, and conferences are used to disseminate data and information on a regional level. The website and the NCIRWMP Plan (available through the website) provides descriptions of the NCIRWMP process, participants, identified needs, and planning and implementation projects, etc. Related materials are provided through the North Coast Library. Additionally, outside documents and plans that pertain to water and land management in the North Coast (at both regional and watershed scales) are available on website in the Documents and Plans webpage ([http://www.northcoastirwmp.net/Content/10331/North Coast Documents and Plans.html](http://www.northcoastirwmp.net/Content/10331/North_Coast_Documents_and_Plans.html)). Special topics information is also available through the website, which provides the NCIRWMP process of identification of and strategies for addressing special needs, staff research about the identified topic, and other relevant information. Additionally, analyses of cumulative project benefits at the regional scale will be provided for each grant cycle using quantitative data reported by project proponents during project implementation.