

DEPARTMENT OF WATER RESOURCES

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SENT VIA EMAIL

March 27, 2018

Ms. Lindsay Mattos
Administrator
Tuolumne-Stanislaus IRWMA
Post Office Box 4394
Sonora, California 95370

Subject: Completion of DWR Review of Tuolumne-Stanislaus (T-S) Integrated Regional Water Management Plan 2016 Update and Notification of Start of 30-Day Public Comment Period

Dear Ms. Mattos:

Enclosed please find the Department of Water Resources (DWR) Draft Review of the Tuolumne-Stanislaus (T-S) Plan 2016 update. DWR has determined that a few of the components of the plan are insufficient to comply with the IRWM Plan Standards contained in the 2016 IRWM Grant Program Guidelines (Guidelines). For example, the addition of the following language addressing the Data Management IRWM Plan Standard "Describe the QA/QC measures for data" which you provided to us, will help ensure that your IRWM plan sufficiently addresses that Plan Standard:

"The Tuolumne - Stanislaus IRWM will work to ensure that all data uploaded to the Data Management System (DMS) goes through a quality control and assurance process.

Currently, all data that is to be added to the DMS is reviewed by the appropriate subcommittee and then presented to the Watershed Advisory Committee (WAC) for review. Once the WAC has reviewed the data and verified its source, staff is directed to upload the data onto the DMS. All project related data is also reviewed by the board/Regional Water Management Group prior to being added.

The T-S IRWM plans to continue to utilize the WAC to ensure the quality of the data added to the Region's DMS."

Pursuant to Volume 2, Section IV of the Guidelines, the 30-day public comment period for this review will begin on April 2, 2018 and end on May 2, 2018. The draft review will be posted online at: <https://www.water.ca.gov/Work-With-Us/Grants-And-Loans/IRWM-Grant-Programs/Plan-Review-Process>.

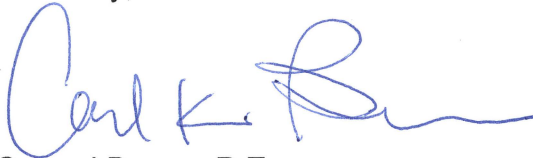
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We will inform you of any comments received. After the public comment period ends, the link to the draft review will become inactive on the website. DWR will consider all comments and work with you on any resultant follow up action. DWR will then finalize 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,

A handwritten signature in blue ink, appearing to read "Carmel Brown".

Carmel Brown, P.E.
Chief, Financial Assistance Branch
Division of Integrated Regional Water Management

cc: Ms. Carolyn Lott
Lead Facilitator
Carlson Consulting

IRWM Plan Review Form

(Per 2016 Plan Standards)

IRWM Planning Region:

Tuolumne-Stanislaus

Regional Water Management Group:

Tuolumne-Stanislaus Integrated Regional Water Management Group

IRWM Plan Title:

Tuolumne-Stanislaus Integrated Regional Water Management Plan

RESULT: PLAN IS SUFFICIENT

IRWM Plan Standard	Overall Standard Sufficient (yes/no)	One or More Requirement(s) Insufficient
Governance	Yes	
Region Description	Yes	
Objectives	Yes	
Resource Management Strategies	Yes	
Integration *	Yes	
Project Review Process	Yes	X
Impact and Benefit	Yes	X
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	X
Coordination	Yes	
Climate Change	Yes	

* If not included as an individual section use Governance, Project Review Process, and Data Management Standards per 2016 Guidelines, p. 52.

Additional Comments:

Project Review Process: Appendix E.4 is missing.

Impact and Benefit: The plan does not state clearly when the impact and benefit section will be updated as part of the normal planning activities.

Stakeholder Involvement: The plan does not describe the roles that stakeholders can occupy within the decision making process.

IRWM PLAN REVIEW FORM

INTRODUCTION

IRWM planning regions must have an IRWM Plan that has been reviewed and deemed consistent with the IRWM Plan Standards by DWR for eligibility to receiving Proposition 1 IRWM Implementation Grant funding. DWR will use this IRWM Plan Standards Review Form, which can be found at the link in Volume 1, Appendix A of the 2016 Guidelines and represented in Table 7 of the Guidelines, to ensure a consistent assessment of whether the 2016 IRWM Guidelines are being addressed in the IRWM Plan. The form contains a checklist for each of the 16 Plan Standards and narrative evaluations where required. 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 fifteen 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 summarized 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 2016 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 2016 IRWM 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 a footnote () are required by legislation to be included in an IRWM Plan.

Requirement	Requirements are taken directly from the 2016 IRWM Guidelines.
2016 IRWM Guidelines Source Page(s)	Page(s) in the 2016 IRWM Guidelines which pertain to the Requirement and include the regulatory or other citations where applicable.
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.
Evidence of Plan 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).

IRWM Plan Standard: Governance					Overall Standard Sufficient		Yes
Requirement		Included		Evidence of Plan Sufficiency			Sufficient
From IRWM 2016 Guidelines	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n	
The RWMG and individual project proponents who adopted the Plan"	37	y/n	y	Sec. 1.3; Appendix A.3		y	
A description of the IRWM governance structure including a discussion of whether or how Native American tribes will participate in the RWMG.	37	y/n	y	Sec. 1.3 & Table 1-1; Sec. 1.4.3.2		y	
A description of how the chosen form of governance addresses and insures:							
Public outreach and involvement processes	37	y/n/q	y	Sec. 1.4	During the plan drafting stakeholder meetings were held at TUD every one to two months, with over 20 meetings, as shown in Table 1-2. A list containing over 130 names and 84 agencies, developed during the planning grant application process, was used as the basis for invitations to the stakeholder meetings. Efforts were made to facilitate participation of a diverse group of stakeholders and no attempt was made to restrict participation. Outreach approaches included an online website, and invitation to the meetings by e-mail. Meeting materials and agendas are posted on the TUD website’s IRWM page and in its office after each stakeholder meeting; and meeting materials are sent out via e-mail to the contact list. Meeting minutes, agendas, handouts and videos of the stakeholder meetings can be viewed on TUD’s website.	y	
Effective decision making	37	y/n/q	y	Sec. 1.3 & Appendix A	The consensus-based process was used for a number of years, but that was later modified to a majority vote process. However, the decision making body attempts to reach consensus and only uses a majority voting process (70% is the definition of a majority) if consensus cannot be reached. The RWMG made that change in 2012 by using the consensus based decision-making process. The RWMG also adopted an IRWM plan development governance structure with Governance Principles, a Financial Agreement and a Memorandum of Understanding (MOU), all of which are found in Appendix A.	y	

IRWM Plan Standard: Governance					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
From IRWM 2016 Guidelines	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Balanced access and opportunity for participation in the IRWM process	37	y/n/q	y	Sec. 1.4 & 9.2.3	<p>Efforts were made to facilitate participation of a diverse group of stakeholders and no attempt was made to restrict participation. Outreach approaches included an online website, and invitation to the meetings by e-mail. Meeting materials and agendas are posted on the TUD website's IRWM page and in its office after each stakeholder meeting; and meeting materials are sent out via e-mail to the contact list.</p> <p>The main purpose of the WAC is to provide leadership and focus on a more detailed, project/program level toward long-term collaboration and cooperation among implementing agencies and organizations to meet the Plan objectives. The primary roles of the WAC (on behalf of the RWMG) could include:</p>	y
Effective communication – both internal and external to the IRWM region	37	y/n/q	y	Sec. 9.2.3.1	<p>Multiple avenues of internal and external communication will be facilitated by the RWMG/AST including:</p> <ul style="list-style-type: none"> - Prepare communication materials for distribution, posting on the project website, and for use in meetings with governing boards and other interested parties. - Conduct meetings at least quarterly that are announced and open to any stakeholder. - Ensure that individuals are assigned to meet and coordinate with neighboring IRWM planning efforts, other local, state, and federal agencies as they relate to accomplishing the objectives in the T-S IRWM Plan. - Ensure that engagement occurs with neighboring IRWM efforts and other state and federal agencies that have interests or could impact meeting the objectives of the Plan. The RWMG/AST will continue to communicate with DWR regional representatives. 	y
Long term implementation of the IRWM Plan	37	y/n/q	y	Sec. 9.2	Recommended Governance Structure for Plan Implementation section	y

IRWM Plan Standard: Governance					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
From IRWM 2016 Guidelines	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Coordination with neighboring IRWM efforts and State and federal agencies	37	y/n/q	y	Sec. 10.2 & 10.3	Coordination with state and federal agencies has occurred during initial formation of the T-S Region and during Plan preparation. Beyond the need for internal coordination, the T-S Region also recognizes the importance of coordination with other nearby IRWM planning regions. Appropriate coordination among regions and agencies can help leverage shared activities, identify opportunities for cooperative projects, and reduce potential conflicts among IRWM projects.	y
The collaborative process(es) used to establish plan objectives	38	y/n/q	y	Sec. 5.3	The Plan Objectives and measurable planning targets were developed using an iterative and collaborative approach that included three initial phases: - Identify the major water-related needs and challenges within the Region - Propose draft Plan Objectives that address the major water-related needs and challenges, discuss, review and refine - Propose draft MPTs that will demonstrate progress towards achieving Plan Objectives, discuss, review and refine	y
How interim changes and formal changes to the IRWM Plan will be performed	38	y/n/q	y	Sec. 9.5	Section 9.5 describes typical types of changes to the plan that will be considered formal and informal, and the process for making the changes.	y
Updating or amending the IRWM Plan	38	y/n/q	y	Sec. 9.5	Section 9.5 describes typical types of changes to the plan that will be considered formal and informal, and the process for making the changes.	y

IRWM Plan Standard: Region Description					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
From IRWM 2016 Guidelines	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
If applicable, describe and explain how the plan will help reduce dependence on the Delta supply regionally.	38	y/n	n/a			N/A
Describe watersheds and water systems	38	y/n	y	Sec. 2.2, 2.7, 2.9, 2.10		y
Describe internal boundaries	38	y/n	y	Sec. 2.6		y
Describe water supplies and demands for minimum 20 year planning horizon	38	y/n	y	Sec. 2.9, Table 2-14, 2-16		y
Describe social and cultural makeup, including specific information on DACs and tribal communities in the region and their water challenges.	38	y/n/q	y	Sec. 2.3	The story of the Region's development earlier in this section hints at the broad range of social and cultural values that characterize the area. Although there is not a large population within the Region, much of the community areas that do exist are considered disadvantaged communities.	y
Describe major water related objectives and conflicts (1).	38	y/n/q	y	Chapter 4	The introduction to chapter 4 lists the key issues for the region identified by the region's stakeholders. The rest of the chapter describes major water related conflicts and some potential solutions to achieve the listed objectives (i.e. water reuse, renewable energy)	y
Explain how IRWM regional boundary was determined and why region is an appropriate area for IRWM planning.	38	y/n/q	y	Sec. 1.2.3	Defined mostly by the Upper Tuolumne and Upper Stanislaus rivers watersheds, but also defined by political jurisdictions, water/wastewater agency service areas, physical characteristics of the landscape, streams and watersheds, water-related man-made infrastructure, agency service areas, and major governmental land ownership.	y
Describe neighboring and/or overlapping IRWM efforts	38	y/n	y	Sec. 1.4.4		y
Explain how opportunities are maximized (e.g. people at the table, natural features, infrastructure) for integration of water management activities	38	y/n	y	Sec. 1.4 & Section 10		y

IRWM Plan Standard: Region Description				Overall Standard Sufficient		Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
From IRWM 2016 Guidelines	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Describe water quality conditions. If the IRWM region has areas of nitrate, arsenic, perchlorate, or hexavalent chromium contamination, the Plan must include a description of location, extent, and impacts of the contamination; actions undertaken to address the contamination, and a description of any additional actions needed to address the contamination (2).	38	y/n	y	Sec 2.11, Sec. 2.11.1.4, 2.11.2.1		y
Describe likely Climate Change impacts on their region as determined from the vulnerability assessment.	38	y/n	y	Sec. 4.7, Appendix D		y

IRWM Plan Standard Requirements for 2016 IRWM Guidelines in Addition to Previously Required 2012 IRWM Guideline Requirements. See Appendix H in IRWM 2016 Guidelines.

(1) Requirement must be addressed per CWC §10541 (e)(3).

(2) Requirement must be addressed per CWC §10541 (e)(14).

IRWM Plan Standard: Plan Objectives				Overall Standard Sufficient		Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
From IRWM 2016 Guidelines	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.	Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation		y/n
Through the objectives or other areas of the plan, the 7 items on pg 49 of GL are addressed (1) .	49	y/n	y	Sec. 5.4		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	48 - 50	y/n	y	Sec. 5.1, 5.2, 5.3		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 (2) .	49	y/n/q	y	Sec. 5.4		y
Explain how objectives are prioritized or reason why the objectives are not prioritized	50	y/n/q	y	Sec. 5.5, Table 5-1		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.	50	y/n	y			N/A
Address adapting to changes in the amount, intensity, timing, quality and variability of runoff and recharge.	39	y/n	y	Sec. 5.4, Obj. B, Table 5-1, Table 7-2		y
Consider the effects of sea level rise (SLR) on water supply conditions and identify suitable adaptation measures.	39	y/n	y	Table 5-1		N/A
Reducing energy consumption, especially the energy embedded in water use, and ultimately reducing GHG emissions.	39	y/n	y	Sec. 5.4, Obj. L, Table 5-1, Table 7-2		y
In evaluating different ways to meet IRWM plan objectives, where practical, consider the strategies adopted by CARB in its AB 32 Scoping Plan.	39	y/n	y	Sec 7.2.4, Table 7-2		y
Consider options for carbon sequestration and using renewable energy where such options are integrally tied to supporting IRWM Plan objectives.	39	y/n	y	Table 5-1, H		y

IRWM Plan Standard Requirements for 2016 IRWM Guidelines in Addition to Previously Required 2012 IRWM Guideline Requirements. See Appendix H in IRWM 2016 Guidelines.

(1) Requirement must be addressed per CWC §10540 (c).

(2) Requirement must be addressed per CWC §10541 (e).

IRWM Plan Standard: Resource Management Strategies (RMS)					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
From IRWM 2016 Guidelines	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Address which RMS will be implemented in achieving IRWM Plan Objectives (1).	39	y/n	y	Sec. 6.3		y
Identify RMS incorporated in the IRWM Plan: Consider all California Water Plan (CWP)RMS criteria (29) listed in Table 3 from the CWP Update 2013	39	y/n	y	Sec. 6, Table 6-1		y
Consideration of climate change effects on the IRWM region must be factored into RMS. Identify and implement, using vulnerability assessments and tools such as those provided in the Climate Change Handbook, RMS and adaptation strategies that address region-specific climate change impacts. • Demonstrate how the effects of climate change on its region are factored into its RMS. • Reducing energy consumption, especially the energy embedded in water use, and ultimately reducing GHG emissions. • An evaluation of RMS and other adaptation strategies and ability of such strategies to eliminate or minimize those vulnerabilities, especially those impacting water infrastructure systems (2).	39	y/n	y	6.3.1	Adequate information on the factoring of climate change effects into RMS was present but difficult to find. Information was located throughout Section 6.3.1 in the RMS summary descriptions, but a lookup table linking the RMS to the IRWM Plan Objectives pertaining to climate change similar to the CWP Objectives in Table 6-1 would be helpful.	y

IRWM Plan Standard Requirements for 2016 IRWM Guidelines in Addition to Previously Required 2012 IRWM Guideline Requirements. See Appendix H in IRWM 2016 Guidelines.

(1) Requirement must be addressed per CWC §10540 (e)(1).

(2) Requirement must be addressed per CWC §10540 (e)(10).

IRWM Plan Standard: Integration				Overall Standard Sufficient		Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
From IRWM 2016 Guidelines	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Contains structure and processes for developing and fostering integration ¹ : - Stakeholder/institutional - Resource - Project implementation	39	y/n/q	y	Sec. 1.4, 7.1, & Chapter 6		y

1. If not included as an individual section use Governance, Project Review Process, and Data Management Standards per 2016 IRWM Guidelines, p. 52.

IRWM Plan Standard: Project Review Process					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
From IRWM 2016 Guidelines	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	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	39 - 40	y/n	y	Sec. 7.1, 7.2, 7.3, Appendix E		y
Does the project review process in the plan incorporate the following factors:						
How a project contributes to plan objectives	40	y/n	y	Table 7-2, Appendix E.3		y
How a project is related to Resource Management Strategies identified in the plan.	40	y/n	y	Appendix E.1		y
The technical feasibility of a project.	40	y/n	y	Table 7-1		y
A projects specific benefits to a DAC water issue.	40	y/n	y	Table 7-1		y
Environmental Justice considerations.	40	y/n	y	Appendix E.1, E.3		y
Project costs and financing	40	y/n	y	Table 7-2, Appendix E.3		y
Address economic feasibility	40	y/n	y	Appendix E.1		y
Project status	40	y/n	y	Sec. 7.2.1, Table 7-1		y
Strategic implementation of plan and project merit	40	y/n	y	Sec. 7.2.1	Missing Appendix E.4	y
Status of the Project Proponent's IRWM plan adoption	40	y/n	y	Appendix E-1		y
Project's contribution to reducing dependence on Delta supply (for IRWM regions receiving water from the Delta).	40	y/n				N/A
Project's contribution to climate change adaptation. • Include potential effects of Climate Change on the region and consider if adaptations to the water management system are necessary (1). • Consider the contribution of the project to adapting to identified system vulnerabilities to climate change effects on the region. • Consider changes in the amount, intensity, timing, quality and variability of runoff and recharge. • Consider the effects of SLR on water supply conditions and identify suitable adaptation measures.	40	y/n	y	Table 7-2		y

IRWM Plan Standard: Project Review Process					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
From IRWM 2016 Guidelines	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Contribution of project in reducing GHGs compared to project alternatives. • Consider the contribution of the project in reducing GHG emissions as compared to project alternatives • Consider a project's ability to help the IRWM region reduce GHG emissions as new projects are implemented over the 20-year planning horizon. • Reducing energy consumption, especially the energy embedded in water use, and ultimately reducing GHG emissions.	40	y/n	y	Table 7-2		y
Specific benefits to critical water issues for Native American tribal communities.	53	y/n	y	Table 7-2		y

IRWM Plan Standard Requirements for 2016 IRWM Guidelines in Addition to Previously Required 2012 IRWM Guideline Requirements. See Appendix H in IRWM 2016 Guidelines.

(1) Requirement must be addressed per CWC §10540 (e)(10).

IRWM Plan Standard: Impact and Benefit					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
IRWM 2016 Guidelines Requirement	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Discuss potential impacts and benefits of plan implementation within IRWM region, between regions, with DAC/EJ concerns and Native American Tribal communities	40	y/n	y	Sec. 8.1, 8.2		y
State when a more detailed project-specific impact and benefit analysis will occur (prior to any implementation activity)	55	y/n	y	Chapter 8 Intro		y
Review and update the impacts and benefits section of the plan as part of the normal plan management activities	55 - 56	y/n	n		The plan does not state clearly when the impact and benefit section will be updated as part of the normal planning activities.	n

IRWM Plan Standard: Plan Performance and Monitoring					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
IRWM 2016 Guidelines Requirement	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Contain performance measures and monitoring methods to ensure that IRWM objectives are met (1) .	40	y/n	y	Sec. 9.4		y
Contain a methodology that the RWMG will use to oversee and evaluate implementation of projects.	40	y/n	y	Sec. 9.4		y
Each project in the IRWM Plan is monitored to comply with all applicable rules, laws, and permit requirements.	58	y/n	y	Sec. 9.2.2.6		y
Contain policies and procedures that promote adaptive management and, as more effects of Climate Change manifest, new tools are developed, and new information becomes available, adjust IRWM plans accordingly.	40	y/n	y	Sec. 9.5		y

IRWM Plan Standard Requirements for 2016 IRWM Guidelines in Addition to Previously Required 2012 IRWM Guideline Requirements. See Appendix H in IRWM 2016 Guidelines.

(1) Requirement must be addressed per CWC §10541 (e)(7).

IRWM Plan Standard: Data Management					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
IRWM 2016 Guidelines Requirement	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Describe data needs within the IRWM region	59 - 60	y/n	y	Sec. 9.4		y
Describe typical data collection techniques	59 - 60	y/n	y	Sec. 9.4		y
Describe stakeholder contributions of data to a data management system	59 - 60	y/n	y	Sec. 9.4		y
Describe the entity responsible for maintaining data in the data management system	59 - 60	y/n	y	Sec. 9.4		y
Describe the QA/QC measures for data	59 - 60	y/n	y	Sec. 9.4		y
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 (1).	59 - 60	y/n	y	Sec. 9.4		y
Explain how the Data Management System supports the RWMG's efforts to share collected data	59 - 60	y/n	y	Sec. 9.4		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).	59 - 60	y/n	y	Sec. 9.4.2		y

(1) Requirement must be addressed per CWC §10541 (e)(12).

IRWM Plan Standard: Finance				Overall Standard Sufficient	
Requirement		Included		Evidence of Plan Sufficiency	Yes
IRWM 2016 Guidelines Requirement	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation
Include a programmatic level (i.e. general) plan for implementation and financing of identified projects and programs (1) including the following:	41	y/n		Sec 9.3	y
List known, as well as, possible funding sources, programs, and grant opportunities for the development and ongoing funding of the IRWM Plan.	41	y/n		Sec 9.3	y
List the funding mechanisms, including water enterprise funds, rate structures, and private financing options, for projects that implement the IRWM Plan.	41	y/n		Sec 9.3	y
An explanation of the certainty and longevity of known or potential funding for the IRWM Plan and projects that implement the Plan.	41	y/n		Sec 9.3	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.	41	y/n		Sec 9.3	y

(1) Requirement must be addressed per CWC §10541 (e)(8).

IRWM Plan Standard: Technical Analysis					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
IRWM 2016 Guidelines Requirement	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Document the data and technical analyses that were used in the development of the plan (1) .	41	y/n	y	Appendix C		y

(1) Requirement must be addressed per CWC §10541 (e)(11).

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IRWM Plan Standard: Relation to Local Water Planning					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
IRWM 2016 Guidelines Requirement	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Identify a list of local water plans used in the IRWM plan	41	y/n	y	Appendix C (Table C-2)		y
Describe the dynamics between the IRWM plan and other planning documents	41	y/n	y	Appendix C.2, Sec. 3.1.2 (p. 111)		y
Describe how the RWMG will coordinate its water management planning activities	41	y/n	y	Sec. 3.1.2		y
Discuss how the plan relates to these other planning documents and programs. Same as 2012 GL with the following addition: "It should be noted that Water Code § 10562 (b)(7) requires the development of a stormwater resource plan and compliance with these provisions to receive grants for stormwater and dry weather runoff capture projects. Upon development of the stormwater resource plan, the RWMG shall incorporate it into IRWM plan. The IRWM Plan should discuss the processes that it will use to incorporate such plans." Minor wording differences - e.g. Groundwater Sustainability Plan example in the 2016 Guidelines instead of Groundwater Management Plan in the 2012 Guidelines.	63 - 64	y/n	y	Sec. 3.1.2, Appendix C.2		y
Consider and incorporate water management issues and climate change adaptation and mitigation strategies from local plans into the IRWM Plan.	63 - 64	y/n	y	Sec. 3.1.2, Appendix C.2		y

IRWM Plan Standard Requirements for 2016 IRWM Guidelines in Addition to Previously Required 2012 IRWM Guideline Requirements. See Appendix H in IRWM 2016 Guidelines.

IRWM Plan Standard: Relation to Local Land Use Planning					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
IRWM 2016 Guidelines Requirement	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Document current relationship between local land use planning, regional water issues, and water management objectives	41	y/n	y	Sec. 3.2		y
Document future plans to further a collaborative, proactive relationship between land use planners and water managers	41	y/n	y	Sec. 3.2.3		y
Demonstrate information sharing and collaboration with regional land use planning in order to manage multiple water demands throughout the state, adapt water management systems to climate change, and potentially offset climate change impacts to water supply in California.	41	y/n		Sec. 3.2.3		y

IRWM Plan Standard Requirements for 2016 IRWM Guidelines in Addition to Previously Required 2012 IRWM Guideline Requirements. See Appendix H in IRWM 2016 Guidelines.

IRWM Plan Standard: Stakeholder Involvement					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
IRWM 2016 Guidelines Requirement	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Discuss involvement of DACs and tribal communities in the IRWM planning effort	41 - 42	y/n	y	Sec. 1.4.3		y
Describe decision-making process and roles that stakeholders can occupy	41 - 42	y/n	n		The plan does not describe the roles that stakeholders can occupy within the decision making process.	n
Discuss how stakeholders are necessary to address objectives and RMS	41 - 42	y/n	y	Sec. 1.4, 5.1, 5.3, 9.2		y
Discuss how a collaborative process will engage a balance in interest groups	41 - 42	y/n	y	Sec. 1.4, Sec. 9.2.3		y
Contain a public process that provides outreach and opportunity to participate in the IRWM plan (1). Per 2016 GL: "Native American tribes – It should be noted that tribes are sovereign nations, and as such coordination with tribes is on a government-to-government basis."	41 - 42	y/n	y	1.4.1, 10.1.1, 10.1.2, Appendix B		y
Identify process to involve and facilitate stakeholders during development and implementation of IRWM plan regardless of ability to pay; include description of any barriers to involvement (2). "Stakeholder Involvement" in the 2012 GL is referred to "Native American Tribe and Stakeholder Involvement" in the 2016 GL and Tribes are referred to specifically.	41 - 42	y/n	y	1.4.1, 1.4.2, 1.4.3, 10.1.1, 10.1.2		y

IRWM Plan Standard Requirements for 2016 IRWM Guidelines in Addition to Previously Required 2012 IRWM Guideline Requirements. See Appendix H in IRWM 2016 Guidelines.

(1) Requirement must be addressed per CWC §10541 (g).

(2) Requirement must be addressed per CWC §10541 (h)(2).

IRWM Plan Standard: Coordination				Overall Standard Sufficient		Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
IRWM 2016 Guidelines Requirement	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	
Identify the process to coordinate water management projects and activities of participating local agencies and stakeholders to avoid conflicts and take advantage of efficiencies (1).	42	y/n	y	Sec. 1.4, 10.1, 10.2		y
Identify neighboring IRWM efforts and ways to cooperate or coordinate, and a discussion of any ongoing water management conflicts with adjacent IRWM efforts	42	y/n	y	Sec. 1.4.4, 10.3		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.	42	y/n	y	Sec. 1.4.2, 10.2		y

(1) Requirement must be addressed per CWC §10541 (e)(13).

IRWM Plan Standard: Climate Change					Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
IRWM 2016 Guidelines Requirement	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.	Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation		y/n
Contain a plan, program, or methodology for further data gathering and analysis of prioritized vulnerabilities.	42 - 44	y/n	y	Sec. 5.6.2, Table 5-2		y
Include climate change as part of the project review process.	42 - 44	y/n	y	Appendix E-1		y
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 (1). Addition in 2016 GL - "At a minimum, the vulnerability evaluation must be equivalent to the vulnerability assessment contained in the Climate Change Handbook for Regional Water Planning, Section 4 and Appendix B."	42 - 44	y/n	y	Sec. 5.6, Appendix D		y
Provide a process that considers GHG emissions when choosing between project alternatives (1). Addition in 2016 GL - "At a minimum, that process must determine a project's ability to help the IRWM region reduce GHG emissions as new projects are implemented over a 20-year planning horizon and consider energy efficiency and reduction of GHG emissions when choosing between project alternatives."	42 - 44	y/n	y	Sec. 5.6.2, 7.2.1, Appendix E-1		y
Include a list of prioritized vulnerabilities based on the vulnerability assessment and the IRWM's decision making process. Addition in 2016 GL - "A list of prioritized vulnerabilities which includes a determination regarding the feasibility for the RWMG to address the priority vulnerabilities."	42 - 44	y/n	y	Appendix D		y
Address adapting to changes in the amount, intensity, timing, quality, and variability of runoff and recharge.	42 - 44	y/n	y	Sec. 5.6.1, 7.2.1		y
Areas of the State that receive water imported from the Sacramento-San Joaquin River Delta, the area within the Delta, and areas served by coastal aquifers must also consider the effects of sea level rise (SLR) on water supply conditions and identify suitable adaptation measures.	42 - 44	y/n	y			N/A

IRWM Plan Standard Requirements for 2016 IRWM Guidelines in Addition to Previously Required 2012 Guideline Requirements. See Appendix H in IRWM 2016 Guidelines.

(1) Requirement must be addressed per CWC §10541 (e)(9).