- The Climate Registry is a private non-profit organization that serves as a voluntary GHG emissions registry for North America. Participation in these voluntary GHG registries allows access to tools and consistent reporting formats that may aid RWMGs in understanding their GHG emissions and ways to promote early actions to reduce GHG emissions.
- For project-level GHG emissions assessments, a useful emissions reporting protocol has been developed by the World Resources Institute (WRI) in cooperation with the World Business Council for Sustainable Development. WRI protocol was used as the basis for the Climate Registry; both emissions reporting protocols establish-+h guidelines for voluntary accounting of GHG emissions and provide a peer reviewed and widely accepted methodology for calculating GHG emissions. WRI has also published several calculation tools to simplify and document the procedure. In general, the protocols outline how to estimate emissions from mobile combustion sources, electricity consumption, and industrial processes.

IV. PLAN REVIEW PROCESS

Purpose and Use

The Plan Review Process (PRP) is used by DWR to evaluate IRWM plans against the above-listed IRWM plan standards. One of the grant eligibility requirements for the Proposition 1 IRWM Implementation Grant funding is adoption of an IRWM Plan that is consistent with the IRWM Plan Standards contained in the 2016 IRWM Program Guidelines. The PRP provides a standardized means to review IRWM Plans for consistency. The PRP is composed of four major elements – when to submit, what to submit, how to submit, and DWR's review efforts.

Please note that future grant eligibility, associated with the IRWM Plan Standards, may need to be reevaluated if the plan content or eligibility criteria are altered through future legislative actions, such as the appropriations process.

There are several reasons or combinations of reasons that a Regional Water Management Group (RWMG) may decide to submit an IRWM Plan to the PRP. The RWMG submitting the IRWM Plan must be clear on reasons for submitting their plans. Potential reasons for submitting a plan for review include eligibility for future funding and general IRWM plan review.

When to Submit

DWR will generally review plans as they are received. For RWMGs seeking IRWM Plan review prior to a future Implementation Grant solicitation, DWR recommends that the IRWM Plan be submitted as early as possible prior to the application deadline. This will afford RWMG's time to address any deficiencies identified by DWR prior to any funding considerations or constraints. To ensure that IRWM Plan reviews can be completed in time, DWR will set a plan submittal deadline of 60 calendar days prior to the application due date for the Proposition 1 Implementation grant solicitation. RWMGs, and respective project proponents, are encouraged to adopt their updated IRWM Plan after completing the relevant plan updates, so as to have proof of adoption of the most up-to-date IRWM Plan for eligibility purposes of upcoming grant solicitations.

What to Submit

The submittal package consists of three items, a transmittal letter, an electronic copy of the plan, and an optional "road map" that refers reviewers to specific pages for required plan elements.

- 1. *Transmittal Letter/Email (Required)*. The transmittal letter or email must include the following items:
 - Name of the IRWM region and name of the organization submitting the IRWM Plan
 - Name and contact information (email address, mailing address, and phone number) of one specific individual acting as contact for the plan. This individual will receive correspondence regarding results of the plan review.
 - Status of the IRWM Plan at the time of submittal (i.e., final and not adopted or adopted).
 - For non-adopted IRWM Plans, a list of any remaining steps that the RWMG must undertake prior to formal adoption by the RWMG and others, including the timeline to adoption.
- 2. *IRWM Plan (Required).* The IRWM Plan must be complete, including all appendices. DWR will not review a plan in piecemeal fashion. The IRWM Plan must be at least a final non-adopted version.

The plan may be submitted as a single file or as multiple files. If the IRWM plan is submitted in multiple files, each file should be unambiguously named as part of the entire document in order to ensure complete and timely review by DWR staff; for example Chapter 1, 2, 3, etc., or Appendix A, B, C, etc. Acceptable file formats are: PDF, MS Word, MS Excel, and MS Project.

3. *Reference list to Required Standard Elements (Optional).* A list or lookup table of Plan Standard guideline requirement locations in the IRWM Plan may be provided to DWR. This list will be used by DWR reviewers during the review to access specific locations in the plan that address specific standard requirements.

How to Submit

The transmittal letter/email and IRWM Plan must be submitted electronically. Hard copies of the IRWM Plan will not be accepted. A single CD/DVD is preferred, but submittal via email is also acceptable.

VIA CD/DVD – The CD/DVD can be sent to DWR via any of the following methods:

By U.S. Mail:

California Department of Water Resources Division of Integrated Regional Water Management Financial Assistance Branch – Attn: Chief, Planning Section Post Office Box 942836 Sacramento, CA 94236-0001

Overnight courier to:

California Department of Water Resources Division of Integrated Regional Water Management Financial Assistance Branch – Attn: Chief, Planning Section 1416 9th Street, Room 354 Sacramento, CA 95814

Or hand-deliver to:

901 P Street, Lobby Sacramento, CA 95814 Chief, Planning Grant Section

Via Email

DWR can accept email files up to 50 megabytes inclusive of the email content plus any attachments. An IRWM plan with an overall file size exceeding this limit may be sent in multiple emails. The subject line of each email must include the name of the IRWM region. It must also include the email number and total number of emails being sent to submit the entire plan. For example, the first of three emails from ABC IRWM region would have the subject line of: ABC IRWM region 1 of 3. Each file must be named per this multiple file naming convention. Send the email(s) to DWR_IRWM@water.ca.gov.

Once DWR has received the plan, the IRWM contact person will receive an email confirming the receipt of the plan and estimated completion date of the draft review (approximately 60 calendar days).

Review Process

DWR will review the submitted plans to evaluate whether the IRWM Plan meets each of the 16 IRWM Plan Standards. For IRWM Plans that have been recently evaluated in a PRP, DWR may review only the Standard elements that were updated in the 2016 IRWM Plan Standards. This review will be accomplished using the Plan Standards Review Tool. The Plan Standards Review Tool, Table 7, is an Excel workbook consisting of one worksheet for each of the 16 IRWM Plan Standards. Each worksheet is made up of a checklist of required components (between 1 and 14 components depending on the individual standard) for each standard and may contain narrative evaluations as appropriate. The Plan Standard Review Tool contains formulas within and between worksheets to aid in the review process.

The evaluation is pass/fail assessment; there is no numeric scoring or grading of individual IRWM Plans. A "yes" or "no" determination for each Standard is assigned based on the required component evaluation for each Standard. 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 individual requirements which comprise the Standard. The evaluation for each Plan Standard with any associated insufficiencies is compiled on the Standards Summary page.

For each IRWM Plan reviewed, a review team of two technical reviewers will be assigned. Each reviewer will perform a review using the Plan Standards Review Tool. Once finished, the two technical reviewers will meet with FAB senior staff and create a consensus review. This consensus review, once approved by the FAB Planning Section Chief and Branch Chief, will be provided to the RWMG as a draft review. The RWMG will have an opportunity to comment, per Section VI below.

DWR Response

DWR will send the draft review package to the RWMG contact via email which will include the following:

- Cover letter
- IRWMP Draft Review the review summary sheet and a single review form for each Plan Standard
- Notification of any necessary follow-up
- Request of confirmation that the DWR draft review was received

Public Comment Period

DWR's draft IRWM Plan reviews will be posted on the IRWM grants website. The draft reviews will be batch posted on the first and 15th of the month. A 30-calendar day public comment period (starting on the day the review is posted on the website) will be in place for these reviews. DWR will share any public comments for a particular IRWM plan with the RWMG for that region and will determine whether the comments require being addressed in the plan. DWR will finalize a plan review after the public comment period has closed for the specific review and any related discussion with the applicable RWMG has occurred.

IF THE IRWM PLAN IS CONSISTENT WITH THE PLAN STANDARDS

If the IRWM Plan is consistent with the Plan Standards and no public comments were received by DWR that indicate inconsistency, the cover letter of the review will state that the plan is consistent with the IRWM Planning Act, as outlined in Volume II, Section II of these Guidelines. Draft IRWM reviews will be finalized and the plan will be deemed Plan Standard consistent. A final review will be sent to the RWMG and posted on the website listed above.

IF REVISIONS ARE NECESSARY

If revisions are necessary based on DWR review or public comments, the RWMG will have an opportunity to follow-up with revisions to the IRWM Plan. DWR will contact the RWMG after the 30-day public comment period to determine the status of the RWMG's response. It is incumbent on the RWMG to respond in a timely manner with revisions as the PRP does not exempt IRWM regions from compliance with external deadlines and requirements, such as application due dates.

If revisions are adequate to meet Plan Standards, DWR will accept the revised text without a requirement of any immediate re-adoption of the IRWM Plan. DWR will defer to the processes and timelines that exist in the IRWM Plan for approval of changes to the plan. DWR will finalize the plan review stating actions the IRWM has taken and that the IRWM Plan is now consistent with the standards. The final review will be sent to the IRWM contact and posted on the web.

If revisions are not adequate to make the IRWM Plan consistent with standards, the reasons for the inadequacy will be included in the follow-up response email to the RWMG. Inadequate revisions may be addressed in subsequent follow up with DWR. For applicants seeking eligibility in future grant solicitations, DWR will allow needed revisions up to the date of draft award for an applicable solicitation. DWR's intent through the PRP is to hold any necessary revisions to as few iterations as possible. A final plan review will be sent to the IRWM contact and posted on the web.