

DEPARTMENT OF WATER RESOURCES

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SENT VIA EMAIL

November 2, 2018

Mr. Don Mills
Kaweah Delta Water Conservation District
2975 N Farmersville Blvd.
Farmersville, California 93223

Subject: Final Review- Kaweah River Basin IRWM Plan 2016

Dear Mr. Mills:

This letter transmits the final review of consistency of the Kaweah River Basin Integrated Regional Water Management (IRWM) Plan (Plan) with the IRWM Planning Act and the related IRWM Plan Standards contained in the 2016 IRWM Program Guidelines (Guidelines). The Department of Water Resources (DWR) finished the draft review of the Plan and determined it to be not consistent with the Guidelines. The draft Plan was then posted on DWR's website from September 12, 2017 to October 12, 2017 to satisfy the required 30-day public comment period and no comment was received. Subsequently, on September 26, 2018 DWR received additions to the Plan from the Kaweah Delta Water Conservation District (KDWCD), representing the Kaweah River Basin Regional Water Management Group, which satisfactorily addressed the inconsistencies. Therefore, with inclusion of the Plan additions (attachment *Kaweah River Basin IRWM Plan Update June 2018*) DWR has made the final determination that the Plan is consistent with the Guidelines. The final review is posted on the following link: <https://www.water.ca.gov/Work-With-Us/Grants-And-Loans/IRWM-Grant-Programs/Plan-Review-Process>.

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 that reads "Carmel Brown".

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

c.c. Shane D. Smith, Kaweah
Delta Water Conservation District

for

IRWM Plan Review Form

(Per 2016 Plan Standards)

IRWM Planning Region:

Kaweah River Basin

Regional Water Management Group:

Kaweah River Basin

IRWM Plan Title:

IRWMP - A Collaborative Effort of Stakeholders
within the Kaweah River Basin

RESULT: PLAN IS SUFFICIENT

IRWM Plan Standard	Overall Standard Sufficient (yes/no)
Governance	Yes
Region Description	Yes (see comments)
Objectives	Yes (see comments)
Resource Management Strategies	Yes
Integration *	Yes
Project Review Process	Yes (see comments)
Impact and Benefit	Yes
Plan Performance and Monitoring	Yes (see comments)
Data Management	Yes
Finance	Yes
Technical Analysis	Yes
Relation to Local Water Planning	Yes
Relation to Local Land Use Planning	Yes
Stakeholder Involvement	Yes
Coordination	Yes
Climate Change	Yes

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

Comments:

DWR recommends that insufficient requirements in the IRWM Plan Standards deemed consistent overall with the 2016 Guidelines be addressed in future IRWM Plan updates.

Please refer to the individual Plan Standard worksheets for details.

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	Chapter 2 / 2-2, Chapter 6 / 16-2		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	Chapter 2 / 2-3 + Table 2, Chapter 12 / 12-8		y
A description of how the chosen form of governance addresses and insures:						
Public outreach and involvement processes	37	y/n/q	y	Chapter 12 / 12-3	"The outreach effort is specifically designed to deal with interested parties issues for which either they are the stakeholder or the representative of a stakeholder segment of the water management world." Their website is open to the public for involvement.	y
Effective decision making	37	y/n/q	y	Chapter 3 / 3-17	"The position of KDWCD has been replaced with the RMG and it is the opinion of the Board of Directors of the RMG that the IRWM Stakeholders Advisory Group continue forming, coordinating and integrating their separate positions and efforts to function in a unified basis in providing input and recommendation to the RMG."	y
Balanced access and opportunity for participation in the IRWM process	37	y/n/q	y	Chapter 12 / 12-2	"A process evolved whereby interested agencies could become signator to a Memorandum of Understanding with the KDWCD."	y
Effective communication – both internal and external to the IRWM region	37	y/n/q	y	Chapter 12	Multiple communication channels in existence.	y
Long term implementation of the IRWM Plan	37	y/n/q	y	Chapter 14 / 14-114	The requirement is addressed in general terms, but more specificity would be desirable.	y
Coordination with neighboring IRWM efforts and State and federal agencies	37	y/n/q	y	Chapter 2,3,12	Coordination with Tule River Basin Plan Development, Tulare Basin JPA Development, Southern Sierra Plan Development, the County of Kings and the County of Tulare and the incorporated cities.	y

IRWM Plan Standard: Governance				Overall Standard Sufficient		Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
The collaborative process(es) used to establish plan objectives	38	y/n/q	Y	Chapter 3 / 3-1	"The intent is to demonstrate to the interested public and to agencies of jurisdiction which regional water management issues the IRWMP is designed to address. The expanded objectives for this IRWMP were formulated in the multiple meetings of the Kaweah Basin RMG IRWMP Stakeholders Advisory Group. These objectives have been ratified, over time, by the Board of Directors of the Kaweah Basin RMG."	y
How interim changes and formal changes to the IRWM Plan will be performed	38	y/n/q	y	Chapter 15 / 15-6	Section 15.3 Plan Updates: Interim Updates and Formal Plan Changes.	y
Updating or amending the IRWM Plan	38	y/n/q	y	Chapter 16 / 16-4	Section 16.3 Plan Amendments	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: 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	y	Chapter 3 / 3-12, Chapter 6 / 6-38		y
Describe watersheds and water systems	38	y/n	y	Chapter 4 / 4-11, Chapter 6		y
Describe internal boundaries	38	y/n	y	Chapter 4 / 4-10, Chapter 6		y
Describe water supplies and demands for minimum 20 year planning horizon	38	y/n	y	Chapter 9 / 9-8		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	n		Social and cultural makeups of the region were not found in the plan.	n
Describe major water related objectives and conflicts (1).	38	y/n/q	y	Chapter 9 / 9-19	"Conjunctive management is the device utilized to maximize water supply reliability, to reduce the impacts on the groundwater reservoir, to avoid subsidence associated with overdraft and to manage water quality related issues. Each of these issues involves the potential for conflicts."	y
Explain how IRWM regional boundary was determined and why region is an appropriate area for IRWM planning.	38	y/n/q	y	Chapter 4 / 4-2	"The KDWCD boundaries are for the most part coincident with the Department of Water Resources Kaweah Sub-basin...boundaries are administrative and political in nature."	y
Describe neighboring and/or overlapping IRWM efforts	38	y/n	y	Chapter 2 / 2-11, Chapter 3 / 3-18		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	Chapter 10		y
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	Chapter 7 / 7-2 IRWM Plan 2018 Update - Chapter 7 / 7-2		y
Describe likely Climate Change impacts on their region as determined from the vulnerability assessment.	38	y/n	y	Chapter 6 / 6-33		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		
Requirement		Included		Evidence of Plan Sufficiency		
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	Sufficient
						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	Chapter 3/3-4, Chapter 6/6-50, Chapter 12/12-7, Chapter 3/3-4, Chapter 9 / 9-31	Section 3.1.18 Provide Avenue to Identify Drinking Water Quality Problems, Establish and Evaluate Solution Sets and Identify Opportunities for Funding and Pathways to Pursue Funding Assistance. "From this basis, work will begin with respect to the drinking water quality of each of those areas and contact with representatives of environmental justice concerns will be made in order to ensure that all possible steps are taken to remedy the drinking water quantity/quality deficiency." Section 3.1.6 Meet Applicable Regional Water Quality Control Board Basin Plan Objectives "Within the Basin, preservation of the remaining examples of riparian oak forest and riparian oak savannah have been undertaken, as well as vernal pool preservation." All 7 items on pg 49 of GL are addressed	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	Chapter 3 / 3-1, Chapter 9/9-33	Section 3.1 Plan Objectives- includes how objectives were developed/ratified and the groups involved (stakeholder advisory committee and board of directors). Section 9.4.1.25 Land Use Planning and Management	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	Chapter 15 / 15-2	Table 15-1 Plan Objective Measurement Method	y

IRWM Plan Standard: Plan Objectives				Overall Standard Sufficient		Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
Explain how objectives are prioritized or reason why the objectives are not prioritized	50	y/n/q	y	Chapter 3 / 3-1	"The objectives have not been established in any priority sequence, as flexibility has been demonstrated to need to exist between these items and issues based on either acknowledged current need for specific implementation of an element or a unique opportunity existing related to a particular objective such as a partnership opportunity or funding opportunity."	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	Chapter 2 / 2-12, Chapter 9 / 9-8, Chapter 12	The Corridor Study- "The Task Force identified three long-term goals: groundwater recharge, stormwater protection and environmental habitat enhancement." 9.3.2 Long Term Priorities	y
Address adapting to changes in the amount, intensity, timing, quality and variability of runoff and recharge.	39	y/n	y	Chapter 6/6-45		y
Consider the effects of sea level rise (SLR) on water supply conditions and identify suitable adaptation measures.	39	y/n	y	Chapter 6 / 6-42		y
Reducing energy consumption, especially the energy embedded in water use, and ultimately reducing GHG emissions.	39	y/n	y	Chapter 6 / 6-52, Chapter 14 / 14-19, Table 14-1		y
In evaluating different ways to meet IRWM plan objectives, where practical, consider the strategies adopted by CARB in its AB 32 Scoping Plan1.	39	y/n	n		Not found in the IRWM Plan	n
Consider options for carbon sequestration and using renewable energy where such options are integrally tied to supporting IRWM Plan objectives.	39	y/n	y	Chapter 6 / 6-57 + Chapter 14 / 14-19	Consideration of Greenhouse Gas Emissions in Project Review Process: "Climate change mitigation can be achieved by reducing energy demands, improving energy efficiency, and carbon sequestration." No mention of renewable energy found in the Plan.	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	Chapter 9 Table 9-1		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	Chapter 9 Table 9-1		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. <ul style="list-style-type: none"> • 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	Chapter 9 / 9-10	"This IRWM Plan evaluates all 37 strategies contained in the 2009 California Water Plan Update with these evaluations including consideration of, plus the additions, with these evaluations including consideration of the following: (5) Discussion of potential impacts of climate change on the strategy; and (6) Ability of the strategy to help adapt to climate change impacts."	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		
Requirement		Included		Evidence of Plan Sufficiency	Yes	
From IRWM 2016 Guidelines		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	Sufficient
IRWM 2016 Guidelines Page Number						y/n
Contains structure and processes for developing and fostering integration ¹ : - Stakeholder/institutional - Resource - Project implementation		39	y/n/q	y	Chapter 3 / 3-17 Section 3.3.2 Integration: "Historically, the three (3) types of integration required by the IRWM Guidelines have existed within the conduct of the Kaweah River Basin IRWM structure."	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	Chapter 13 / 13-3	Section 13.2 Project Solicitation, Qualification, and Prioritization	y
Does the project review process in the plan incorporate the following factors:						
How a project contributes to plan objectives	40	y/n	y	Chapter 13 / 13-3	"At a minimum, a project must satisfy at least one (1) of the IRWM Plan Objectives." "3. Project objectives including a determination of the independent value of the project."	y
How a project is related to Resource Management Strategies identified in the plan.	40	y/n	y	Chapter 13/ 13-4	"23. Relationship to established Resources Management Strategies."	y
The technical feasibility of a project.	40	y/n	y	Chapter 13/ 13-3	"9. Demonstration of project technical feasibility."	y
A projects specific benefits to a DAC water issue.	40	y/n	y	Chapter 13/ 13-4	"13. Opinion and discussion as to the project being a Disadvantaged Community project and the basis for the opinion including the most recent Median Household Income determination and the source for the information."	y
Environmental Justice considerations.	40	y/n	y	Chapter 13/ 13-4	"14. Source(s) of and nature of Environmental Justice concerns, consideration for which potential solutions must be presented."	y
Project costs and financing	40	y/n	y	Chapter 13/ 13-3	"2. Total Project Cost in comparison to proposed cost sharing amount. The economic feasibility of the project, absent grant funding, must be demonstrated."	y
Address economic feasibility	40	y/n	y	Chapter 13/ 13-3	"2. The economic feasibility of the project, absent grant funding, must be demonstrated."	y
Project status	40	y/n	y	Chapter 13/ 13-4	"21. Presentation of a thorough discussion of the project status, including status of CEQA/NEPA compliance, required permits including status of acquired permits and an estimate of time to secure those remaining, bond financing status if applicable and a statement of "Ready to Proceed" if applicable."	y
Strategic implementation of plan and project merit	40	y/n	y	Chapter 13/ 13-4	"15.Examination of the project merit in relation to the strategic implementation of the IRWM Plan."	y

IRWM Plan Standard: Project Review Process				Overall Standard Sufficient		Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
Status of the Project Proponent's IRWM plan adoption	40	y/n	y	Chapter 13/13-4	"18. An Indication of the status of the project proponent's governing body action(s) to adopt the IRWM Plan."	y
Project's contribution to reducing dependence on Delta supply (for IRWM regions receiving water from the Delta).	40	y/n	y	Chapter 13/13-4	"19. Where applicable, the project's contribution to reducing the candidates service area dependence on exports from the Sacramento-San Joaquin Rivers Delta."	y
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	Chapter 3/3-6, Chapter 13/13-3, Chapter 6/6-42, 45	Section 3.1.10 Evaluation of the Need for Supplemental Water Management Strategies Related to the Effects of Climate Change Section 13.2 Project Solicitation, Qualification, and Prioritization Section 6.8.2 Vulnerability Assessment: Potential Changes in Runoff and Recharge, Sea Level Rise is not a concern.	y
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	Chapter 13/13-3, 4, Chapter 6/6-57	Section 13.2 Project Solicitation, Qualification, and Prioritization "#17. An examination and computation, if possible, of the project's contribution to reduction of Greenhouse Gases as compared to the projects identified alternatives." Consideration of Greenhouse Gas Emissions in Project Review Process. No mention of energy embedded in water use.	y
Specific benefits to critical water issues for Native American tribal communities.	53	y/n	n		Not found in the Plan.	n

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		
Requirement		Included		Evidence of Plan Sufficiency		
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	Yes Sufficient 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	Chapter 14 / 14-1-12	Section 14.1.2 Benefits of Regional Water Management Section 14.1.4 Adjacent IRWM Area Benefits and Impacts Section 14.1.5 Benefits and Impacts to DACs and Other Parties No mention of potential impacts to Native American Tribal Communities.	y
State when a more detailed project-specific impact and benefit analysis will occur (prior to any implementation activity)	55	y/n	y	Chapter 14 / 14-16	Section 14.5.3 Required Impact Analysis Elements: "In order to provide overall IRWMP guidance to efforts such as existed with the Stakeholders Advisory Group in development of project evaluation criteria and scoring, the IRWM Plan at this juncture, sets forth a minimum set of resource-specific impacts which are to be considered in project development and evaluation."	y
Review and update the impacts and benefits section of the plan as part of the normal plan management activities	55 - 56	y/n	y	Chapter 14 - 14-20	Section 14.6 IRWM Plan Benefits and Impacts Considerations Revisions and Updates	y

IRWM Plan Standard: Plan Performance and Monitoring				Overall Standard Sufficient		
Requirement		Included		Evidence of Plan Sufficiency		
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	Sufficient
		y/n	y			y/n
Contain performance measures and monitoring methods to ensure that IRWM objectives are met (1) .	40	y/n	y	Chapter 15, 15-1		y
Contain a methodology that the RWMG will use to oversee and evaluate implementation of projects.	40	y/n	y	Chapter 14 / 14-21		y
Each project in the IRWM Plan is monitored to comply with all applicable rules, laws, and permit requirements.	58	y/n	y	Chapter 14 / 14-20-22		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	n		No mention of policies and procedures that promote adaptive management; no development of tools, and no adjustments of IRWM plan due to ever-growing effects of Climate Change.	n

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	IRWM Plan 2018 Update - 15/15-15		y
Describe typical data collection techniques	59 - 60	y/n	y	Chapter 15/15-4 IRWM Plan 2018 Update - 15/15-15		y
Describe stakeholder contributions of data to a data management system	59 - 60	y/n	y	Chapter 15/15-4		y
Describe the entity responsible for maintaining data in the data management system	59 - 60	y/n	y	Section 15.2.3		y
Describe the QA/QC measures for data	59 - 60	y/n	y	IRWM Plan 2018 Update - 15/15-15		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	Section 15.2		y
Explain how the Data Management System supports the RWMG's efforts to share collected data	59 - 60	y/n	y	Section 15.2		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	Section 15.2.5		y

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

IRWM Plan Standard: Finance				Overall Standard Sufficient		
Requirement		Included		Evidence of Plan Sufficiency		
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	Yes Sufficient y/n
Include a programmatic level (i.e. general) plan for implementation and financing of identified projects and programs (1) including the following:	41	y/n	y	Section 14.3.4 & 14.7.1		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	y	Section 14.3.4, 14.1.5 + Chapter 9/9-5		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	y	Chapter 13/13-5		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	y	Chapter 2/2-18 + Section 14.3.4		y
An explanation of how operation and maintenance (O&M) costs for projects that implement the IRWM Plan would be covered and the certainty of operation and maintenance funding.	41	y/n	y	Chapter 13/13-4		y

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

IRWM Plan Standard: Technical Analysis				Overall Standard Sufficient	
Requirement		Included		Evidence of Plan Sufficiency	
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
Document the data and technical analyses that were used in the development of the plan (1).	41	y/n	y	Chapter 2 / 2-11, Chapter 15 / 15-1	

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

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	Chapter 11		y
Describe the dynamics between the IRWM plan and other planning documents	41	y/n	y	Chapter 11 / 11-1		y
Describe how the RWMG will coordinate its water management planning activities	41	y/n	y	Chapter 12 / 12-1		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	Chapter 2/2-15, Chapter 3/3-2, 8, Chapter 11/11-7		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	Chapter 9/9-8, 22 , Chapter 11/11-6		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	Chapter 9/9-33 + Chapter 11/11-2		y
Document future plans to further a collaborative, proactive relationship between land use planners and water managers	41	y/n	y	Chapter 9/9-33		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	y	Chapter 3/3-2 , Chapter 9-9-2		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: Stakeholder Involvement				Overall Standard Sufficient		
Requirement		Included		Evidence of Plan Sufficiency		
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	Yes Sufficient y/n
Discuss involvement of DACs and tribal communities in the IRWM planning effort	41 - 42	y/n	y	Chapter 12/12-3,5, Chapter 14 / 14-11, 18		y
Describe decision-making process and roles that stakeholders can occupy	41 - 42	y/n	y	Chapter 2/2-2,3, 8, 17		y
Discuss how stakeholders are necessary to address objectives and RMS	41 - 42	y/n	y	Chapter 2/2-12, Chapter 3/3-11		y
Discuss how a collaborative process will engage a balance in interest groups	41 - 42	y/n	y	Chapter 1/1-2, Chapter 2/2-9		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	Chapter 12/12-3, Chapter 12/12-4, Chapter 12/12-8 IRWM Plan 2018 Update Chapter 12/12-8, 9		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	IRWM Plan 2018 Update Chapter 12/12-7, 8, 9		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 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	
Requirement		Included		Evidence of Plan Sufficiency	
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	IRWM Plan 2018 Update page 6	
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	Chapter 2/2-9	
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	Chapter 12/12-5, Chapter 15/15-5	

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

IRWM Plan Standard: Climate Change				Overall Standard Sufficient		
Requirement		Included		Evidence of Plan Sufficiency		
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	Sufficient
						y/n
Contain a plan, program, or methodology for further data gathering and analysis of prioritized vulnerabilities.	42 - 44	y/n	y	Chapter 6/6-51, 52	"Future data gathering and analysis will fall under three broad categories: 1. hydrologic and meteorologic data to characterize climate change trends; 2. analysis of prioritized vulnerabilities; and 3. climate change literature and related legislation."	y
Include climate change as part of the project review process.	42 - 44	y/n	y	Chapter 6/6-30, 52	"When projects are reviewed and prioritized their contribution to addressing climate change will be considered."	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	Chapter 6/6-30-54	"A vulnerability assessment was performed for the Kaweah Basin using the 'Vulnerability Assessment Checklist' found in the Climate Change Handbook for Regional Water Planning. The assessment...offers a practical evaluation of climate change vulnerabilities related to water demand, water supply, water quality, flooding, ecosystems, habitats, and hydropower."	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	Chapter 6/6-52	"As a result, it is sensible to consider impacts to GHG when selecting and prioritizing projects. ... When projects are reviewed and prioritized the project proponents will need to answer the following questions: .."	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	Chapter 6/6-52,53	"Prioritized vulnerabilities: 1. Reduction in surface water supplies, 2. Limited water storage capacity. "Addressing the reductions in surface water supplies has limited feasibility, but increasing the limited storage capacity would be feasible and is a primary focus for the region."	y
Address adapting to changes in the amount, intensity, timing, quality, and variability of runoff and recharge.	42 - 44	y/n	y	Chapter 6/6-54,55	"Increasing groundwater storage is a viable alternative to deal with climate change impacts." "Recharge basins are needed now to increase groundwater supplies, reverse overdraft, improve water reliability and provide flood control benefits." "Specifically, these strategies could help the region adapt to changes in the amount, timing, intensity, quality and variability of runoff and recharge."	y

IRWM Plan Standard: Climate Change				Overall Standard Sufficient		
Requirement		Included		Evidence of Plan Sufficiency	Yes Sufficient	
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	Chapter 6/6-42	"The Kaweah Basin is approximately 100 miles from the ocean and several hundred feet above existing sea level, so sea level rise is not a concern."	y

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).