

DEPARTMENT OF WATER RESOURCES

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SENT VIA EMAIL

November 27, 2018

Mr. Phil Detrich
Grant Administrator
The River Exchange
5727 Dunsmuir Avenue
Dunsmuir, CA 96025

Subject: Upper Sacramento, McCloud, and Lower Pit Region IRWM 2016 Update Review

Dear Mr. Detrich:

Attached please find the Department of Water Resources (DWR) Draft Review of the Upper Sacramento, McCloud and Lower Pit Region Integrated Regional Water Management (IRWM) 2016 Update. DWR has determined that your IRWM Plan is consistent with the IRWM Planning Act and the related IRWM Plan Standards contained in the 2016 IRWM Grant Program Guidelines.

Pursuant to Volume 2, Section IV of the Guidelines the public comment period for this review will begin on November 27, 2018. The Draft Review will be available for public comments for 30 calendar days on the following website: <https://www.water.ca.gov/Work-With-Us/Grants-And-Loans/IRWM-Grant-Programs/Plan-Review-Process>.

After the public comment period ends, the link to the draft review will become inactive on the website. DWR will consider the comments and work with you on any follow up action before finalizing the review and posting on our website.

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" followed by a flourish and the letters "for".

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

cc. Richard Tinsman, Regional Watershed Action Group

IRWM Plan Review Form

(Per 2016 Plan Standards)

IRWM Planning Region: Upper Sacramento, McCloud and Lower Pit Region

Regional Water Management Group: Regional Watershed Action Group (RWAG)

IRWM Plan Title: 2018 Upper Sacramento, McCloud, and Lower Pit IRWM Plan

RESULT: PLAN IS SUFFICIENT

IRWM Plan Standard	Overall Standard Sufficient (yes/no)
Governance	Yes
Region Description	Yes
Objectives	Yes
Resource Management Strategies	Yes
Integration	Yes
Project Review Process	Yes
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

Comments:

Although not required for overall consistency with 2016 IRWM Plan Standards, DWR recommends that the Upper Sacramento, McCloud, and Lower Pit Region RWAG address the following Plan Standard items in future IRWM Plan Updates:

Plan Performance and Monitoring: DWR recommends a discussion of how projects will comply with applicable rules, laws, and/or permit requirements as part of the overall plan performance and monitoring discussion.

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		
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	y/n	
The RWMG and individual project proponents who adopted the Plan"		37	y	16.5.2; Table 16.1	Organizations and process are listed.	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	16.2	Governance history, transition, and future listed. Representatives of local public agencies, non-profit organizations, Tribes, private industry, and communities qualifying as disadvantaged were, and continue to be, active participants in the development and implementation of the IRWM Plan.	y
A description of how the chosen form of governance addresses and insures:						
Public outreach and involvement processes		37	y/n/q	6.2.6	During the initial outreach phase of the development of the IRWM Plan, organizations and agencies in the region were alerted of the opportunity to participate in and, subsequently, to sign on to the MOU. The outreach phase extended longer than the first year of the planning process, allowing an extensive time for contact, communication, and ongoing opportunities for participation in the planning process.	y
Effective decision making		37	y/n/q	16.3	Each signatory to the MOU has a single vote in the GA decision-making process. A motion may only be adopted with the approval of at least two-thirds of the Active Members of each of the three subgroups (i.e., a subgroup with three members requires two votes; four members requires three votes; five members requires four votes).	y
Balanced access and opportunity for participation in the IRWM process		37	y/n/q	16.4	The organizational structure during phase two (2019-2024) of the IRWM Regional Watershed Action Group (RWAG's) collaboration is anticipated to increase interest, improve the region's impact, and provide balanced opportunities for participation.	y
Effective communication – both internal and external to the IRWM region		37	y/n/q	16.5	Chapter 16.5 discusses both internal communication with stakeholders and external communication with neighboring IRWM regions.	y
Long term implementation of the IRWM Plan		37	y/n/q	16.6	After several years of relying upon volunteer administration and coordination, the RWAG has determined that a supported, operational administrative staff is necessary to accommodate efficient and effective decision-making among stakeholders. As a result of past success and the DACI phase, RWAG is establishing an administrative branch to ensure consistent and effective operations. By 2020, RWAG anticipates serving as a leader in place-based climate stabilization for the region.	y

IRWM Plan Standard: Governance				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	Yes Sufficient
						y/n
Coordination with neighboring IRWM efforts and State and federal agencies	37	y/n/q		3.2.4; 16.7	Staff working with RWAG has consulted with representatives from the three adjoining regions on common issues and coordination is good.	y
The collaborative process(es) used to establish plan objectives	38	y/n/q		6.1; 10.6	The plan contains an accounting of the collaborative effort to establish plan objectives.	y
How interim changes and formal changes to the IRWM Plan will be performed	38	y/n/q		16.5.3	It is anticipated that minor changes in strategy or situation could result in occasional changes to the IRWM Plan by the RWAG. which will be incorporated into the appropriate section and result in a revised section or addendum. It is not anticipated, however, that these types of changes will require members to re-adopt the IRWM Plan. There may also be procedural changes requested by RWAG members or required by an outside entity, such as the DWR or other granting agency. In this case, it is likely that a more formal process will be put into place, based largely on the decision-making structure described in Chapter 16.3.	y
Updating or amending the IRWM Plan	38	y/n/q		16.5.4	Stakeholders view the IRWM Plan as a living document, which is essential to assessing the Plan for relevance and effectiveness on a regular basis. It is likely that a formal review of the IRWM Plan and resulting changes will occur, on average, every five years.	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		
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	Yes Sufficient y/n
If applicable, describe and explain how the plan will help reduce dependence on the Delta supply regionally.	38	y		10.1.1		y
Describe watersheds and water systems	38	y		3.7.1		y
Describe internal boundaries	38	y		3.2		y
Describe water supplies and demands for minimum 20 year planning horizon	38	y		3.5.4		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		3.4	The Regional Water Management Group did a good job describing the social and cultural makeup of the region and incorporating the tribal perspective into the plan. Tribal water management challenges are also discussed.	y
Describe major water related objectives and conflicts (1).	38	y/n/q		Chapter 7	Section 7 contains a table and discussion of objectives and metrics for meeting them. "Challenges" are also discussed.	y
Explain how IRWM regional boundary was determined and why region is an appropriate area for IRWM planning.	38	y/n/q		3.2.1	Regional boundaries, including physical and jurisdictional, are discussed.	y
Describe neighboring and/or overlapping IRWM efforts	38	y		3.2.4		y
Explain how opportunities are maximized (e.g. people at the table, natural features, infrastructure) for integration of water management activities	38	y		3.5.7		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		3.7.2.3-3.7.5	All constituents characterized even if no exceedances are found in the Region; low vulnerability to nitrate, perchlorate, arsenic, and hex chrome. Therefore, not much discussion about treatment exists in the Plan.	y
Describe likely Climate Change impacts on their region as determined from the vulnerability assessment.	38	y		3.6.2	Projected impacts of climate change on: water supply, water demand, water quality, flooding, ecosystems and habitat vulnerability, hydropower.	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		Chapter 7		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		7.1; 7.4; 16.8		y
Identify quantitative or qualitative metrics and measurable 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		7.4	Section 7.4 provides metrics for measuring progress towards meeting objectives. Many of the objective's metrics are qualitative.	y
Explain how objectives are prioritized or reason why the objectives are not prioritized	50	y/n/q		7.2	Section 7.2 explains the rationale for not prioritizing objectives.	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		7.3		y
Address adapting to changes in the amount, intensity, timing, quality and variability of runoff and recharge.	39	y		6.2.15	Any management of water resources that contemplates future projections will require consideration of the effects of climate change on water quantity and quality, including changes in the amount, intensity, timing, quality, and variability of runoff and recharge. These considerations and others should continually be incorporated in the Upper Sacramento, McCloud, and Lower Pit River (USR) project development process and ongoing water management efforts.	y
Consider the effects of sea level rise (SLR) on water supply conditions and identify suitable adaptation measures.	39	y		9.5; Appendix F	Because the USR is far from the coast in a mountainous area of the state, issues associated with sea level rise, such as loss of coastal habitats, are not addressed.	y

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
Reducing energy consumption, especially the energy embedded in water use, and ultimately reducing GHG emissions.	39	y		1.2; 7.1; 8.2	Many USR communities are fortunate to rely primarily upon gravity-fed, clean, cold spring water. While there may be opportunities to increase both operational efficiencies and greenhouse gas (GHG) reduction capacity in the region, GHG emissions resulting from municipal water deliveries in the USR are relatively minor.	y
In evaluating different ways to meet IRWM plan objectives, where practical, consider the strategies adopted by CARB in its AB 32 Scoping Plan ¹ .	39	y		3.3.2.7	The power production generated in the USR is largely hydropower. Thus, these activities contribute greatly towards California's AB 32 goals for renewable power generation.	y
Consider options for carbon sequestration and using renewable energy where such options are integrally tied to supporting IRWM Plan objectives.	39	y		8.1.3; Table 9.2	Agricultural lands maintain the character of the watershed, and benefit local economies. They can retain carbon and may be part of a carbon sequestration program to mitigate climate change. Enhance carbon sequestration and resilience through targeted management and restoration activities.	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		
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	Yes Sufficient y/n
Address which RMS will be implemented in achieving IRWM Plan Objectives (1).	39	y		8.1		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		8.1		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		8.3; Table 8.1	In the identification of applicable RMS, stakeholders assessed how well each of these strategies would serve the region in diversifying the implementation strategies for each objective. Table 8.1 identifies the applicability of each of the RMS to each of the objectives	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		
From IRWM 2016 Guidelines		y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Brief Qualitative Evaluation		
IRWM 2016 Guidelines Page Number		Location of Standard in Grantee IRWM Plan		Sufficient		
Contains structure and processes for developing and fostering integration ¹ : - Stakeholder/institutional - Resource - Project implementation		39	y/n/q	2.3	Multiple sections of the plan contain structure and processes for developing and fostering integration. Section 2.3 Integration, describes the process for the region with references to Section 10, Project Integration and Implementation.	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		10.2		y
Does the project review process in the plan incorporate the following factors:						
How a project contributes to plan objectives	40	y		10.6; Table 10.3		y
How a project is related to Resource Management Strategies identified in the plan.	40	y		Chapter 8		y
The technical feasibility of a project.	40	y		10.5		y
A projects specific benefits to a DAC water issue.	40	y		10.5		y
Environmental Justice considerations.	40	y		10.5		y
Project costs and financing	40	y				y
Address economic feasibility	40	y		10.3		y
Project status	40	y		10.5		y
Strategic implementation of plan and project merit	40	y				y
Status of the Project Proponent's IRWM plan adoption	40	y				y
Project's contribution to reducing dependence on Delta supply (for IRWM regions receiving water from the Delta).	40	y		10.1		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		10.3; 10.10	Prioritization must consider effects that climate change has on the region, and include a project's impact on adapting to or mitigating vulnerabilities to climate change identified in Chapter 9, specifically as they pertain to changes in the amount, intensity, timing, quality and variability of runoff and recharge. Project sponsors have proposed five projects that address research and monitoring of groundwater and surface water resources so as to establish a baseline for future studies and improve understanding of water resource vulnerability in the region.	y

IRWM Plan Standard: Project Review Process				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
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		10.3; 10.10	Projects must be evaluated for their potential to reduce GHG emissions compared to project alternatives, as well as their ability to reduce GHG emissions over the 20-year planning horizon. Mitigation activities for GHG emissions coming from project implementation are described for each of the projects in Section 10.5, but largely are minimized through the identification of local labor and expertise, as well as consolidated trips, in the case of the monitoring projects.	y
Specific benefits to critical water issues for Native American tribal communities.	53	y		10.3; 10.7		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		Table 11.1		y
State when a more detailed project-specific impact and benefit analysis will occur (prior to any implementation activity)	55	y		11.5		y
Review and update the impacts and benefits section of the plan as part of the normal plan management activities	55 - 56	y		11.7		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
Contain performance measures and monitoring methods to ensure that IRWM objectives are met (1) .	40	y		12.1; Table 12.1		y
Contain a methodology that the RWMG will use to oversee and evaluate implementation of projects.	40	y		12.1		y
Each project in the IRWM Plan is monitored to comply with all applicable rules, laws, and permit requirements.	58	y		12.1.3	No information was found regarding complying with all applicable rules, laws, and/or permit requirements.	n
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		12.1.5		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		
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
Describe data needs within the IRWM region	59 - 60	y		13.1		y
Describe typical data collection techniques	59 - 60	y		13.2.2		y
Describe stakeholder contributions of data to a data management system	59 - 60	y		13.2.3; 13.2.4		y
Describe the entity responsible for maintaining data in the data management system	59 - 60	y		13.2.5		y
Describe the QA/QC measures for data	59 - 60	y		13.2.6		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		13.2.7		y
Explain how the Data Management System supports the RWMG's efforts to share collected data	59 - 60	y		13.2.7		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		13.2.2		y

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

IRWM Plan Standard: Finance				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
Include a programmatic level (i.e. general) plan for implementation and financing of identified projects and programs (1) including the following:	41	y		15.1; 15.2		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		15.1		y
List the funding mechanisms, including water enterprise funds, rate structures, and private financing options, for projects that implement the IRWM Plan.	41	y		15.2		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		15.1; 15.2; Tables 15.3 and 15.4		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		15.3		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		14.2	

(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		Table 4.1		y
Describe the dynamics between the IRWM plan and other planning documents	41	y		Chapter 4		y
Describe how the RWMG will coordinate its water mgmt planning activities	41	y		Chapter 4		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		Chapter 4	The Sustainable Groundwater Management Act (SGMA) of 2014 requires the development of groundwater sustainability plans for high and medium priority basins. The two sub-basins identified in the USR, McCloud and Toad Well basins are designated as low priority according to SGMA, and therefore have undergone very limited monitoring.	y
Consider and incorporate water management issues and climate change adaptation and mitigation strategies from local plans into the IRWM Plan.	63 - 64	y		4.4; 5.1; 5.2; 5.3; 5.5	Water management issues were found for the City of Mt. Shasta only, not the region in general. Any new General Plan policies relevant to climate change adaptation or mitigation will be incorporated into the IRWM Plan during the next plan update, as appropriate.	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		
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
Document current relationship between local land use planning, regional water issues, and water management objectives	41	y		Chapter 5		y
Document future plans to further a collaborative, proactive relationship between land use planners and water managers	41	y		5.6		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		5.1.2; 5.1.3		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		
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		2.2.4; 2.2.5		y
Describe decision-making process and roles that stakeholders can occupy	41 - 42	y		2.2.7; 16.2-16.4		y
Discuss how stakeholders are necessary to address objectives and RMS	41 - 42	y		2.2.8; 16.8		y
Discuss how a collaborative process will engage a balance in interest groups	41 - 42	y		2.2.8		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		2.2.2; 16.1		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		16.4		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	
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		16.7	
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		16.7	
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		16.7	

(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	y/n
Contain a plan, program, or methodology for further data gathering and analysis of prioritized vulnerabilities.	42 - 44	y	9.1		y
Include climate change as part of the project review process.	42 - 44	y	9.6		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	9.5	This section describes observed climate trends, both recent and historic, as well as associated impacts. However, because not all climate change impacts are relevant to the region, such as sea level rise and the associated intrusion of salt water into freshwater aquifers, they are not discussed herein.	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	9.11	As part of the USR's project evaluation process, project sponsors describe how their projects contribute toward reduced GHG emissions and climate change adaptation.	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	9.9; Table 9.3	Qualitatively establishing priorities was not considered to be appropriate or feasible for this update. Instead priorities were established based on the perceived urgency and degree of risk associated with each vulnerability, as well as the anticipated level of cost or effort required to address the vulnerability.	y
Address adapting to changes in the amount, intensity, timing, quality, and variability of runoff and recharge.	42 - 44	y	9.6.6; 9.7.1	Adaptation to changes in the amount, intensity, timing, quality, and variability of runoff and recharge is addressed.	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	10.1.1	No USR stakeholder is dependent upon the Delta for water resources. Because not all climate change impacts are relevant to the region, such as sea level rise and the associated intrusion of salt water into freshwater aquifers, they are not discussed herein.	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).