

DEPARTMENT OF WATER RESOURCES

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September 12, 2017

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

Subject: Completion of DWR Review of Kaweah River Basin Integrated Regional Water Management Plan 2016 Update and Notification of Start of 30-Day Public Comment Period

Dear Mr. Mills:

The Department of Water Resources (DWR) has completed our review of the Kaweah River Basin Integrated Regional Water Management (IRWM) Plan 2016 update (IRWM Plan). Based on our review, we find that the Kaweah Delta Water Conservation District IRWM Plan is not consistent with IRWM Planning Act and several of the related IRWM Plan Standards contained in the 2016 IRWM Grant Program Guidelines. In addition, one or more requirements in multiple IRWM Plan Standards which were deemed consistent overall were insufficiently addressed. Please refer to the attached Kaweah River Basin 2016 IRWM Plan Review Form for a detailed description.

DWR's review results are considered draft until the close of public comment period and resolution of comments. Pursuant to the 2016 IRWM Grant Program Guidelines, the 30-days public comment period for this draft review will begin on September 12, 2017. The draft review will be posted online at: <http://www.water.ca.gov/irwm/grants/prp.cfm>.

I encourage you to contact Ted Daum of my staff to discuss the draft review and next steps to facilitate the public review and eventually resolve the discrepancies to finalize the IRWM Plan. Ted can be reached at Theodore.Daum@water.ca.gov or (916) 651-926. It is incumbent on you as the lead representative for the Kaweah River Basin Regional Water Management Group to respond in a timely manner, as the Plan Review Process does not exempt your region from compliance with external deadlines and requirements, such as upcoming grant application due dates or provisions of existing grant agreements.

Sincerely,

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

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

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 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: ONE OR MORE PLAN STANDARDS NOT SUFFICIENT

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

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

Additional Comments:

DWR has determined that the Kaweah Delta Water Conservation District IRWM Plan is not consistent with the IRWM Planning Act and several of the related IRWM Plan Standards contained in the 2016 IRWM Grant Program Guidelines. Note: The IRWM Plan was found consistent with the Data Management IRWM Plan Standard during the 2012 IRWM Plan Standard Review due to an apparent error in the reviewer spreadsheet. However, our recent 2016 IRWM Plan Standard Review has confirmed that the Data Management Plan Standard was in fact insufficient in 2012 and remains insufficient for this 2016 Compliance Review.

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 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	"The governance of this IRWMP resides with the Governing Board put into place as a result of the executed MOU. The Board of Directors is comprised of elected or appointed individuals with specific relationship to each MOU signatory and one (1) individual selected by the Stakeholder Advisory Group." Intent to adopt information is also mentioned in the Plan.	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	"The KDWCD has a longstanding relationship with tribal community representatives in the area...it is a goal of the RMG Board of Directors, staff and consultants to maintain this relationship." Although the IRWM consults tribes when projects are taking place on their land, there is no mention of how they will encourage participation in the RWMG.	n
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

IRWM Plan Standard: Governance				Overall Standard Sufficient		Yes
Requirement		Included		Evidence of Plan Sufficiency		Sufficient
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	IRWMP's Role in the Future'- although the title depicts long term implementation of the plan, section does not adequately address requirement.	n
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
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		No
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	"Delta water is not directly used in the region, but Delta water curtailments do have an important indirect impact on local groundwater supplies."	y
Describe watersheds and water systems	38	y/n	y	Chapter 4 / 4-11, Chapter 6	Section 4.7 Sub-Watersheds, Chapter 6 Responsible Entities, Major Infrastructure, and Water Supplies	y
Describe internal boundaries	38	y/n	y	Chapter 4 / 4-10, Chapter 6	Section 4.6 Land Use: (1) KDWCD Boundary Data. Boundaries also mentioned within Chapter 6.	y
Describe water supplies and demands for minimum 20 year planning horizon	38	y/n	y	Chapter 9 / 9-8	Section 9.3.2 Long Term Priorities	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 mentioned 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." No conflicts stated in Plan Objectives.	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." The Kaweah IRWM Region lies both in Tulare and Kings Counties.	y
Describe neighboring and/or overlapping IRWM efforts	38	y/n	y	Chapter 2 / 2-11, Chapter 3 / 3-18	Section 2.2.5 Coordination with Southern Sierra Plan Development. "Additional coordination efforts take place on a frequent basis with the Kings River Basin group formed under a Joint Powers Authority agreement with their Plan being identified as the Upper Kings Basin Integrated Regional Water Management Plan."	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	Partnership Format, Water Quality Improvement Opportunities, Other Water Management Measures	y

IRWM Plan Standard: Region Description				Overall Standard Sufficient		
Requirement	Included		Evidence of Plan Sufficiency		No Sufficient	
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	"As a result of the pursuit of quality related information on an individual basis, a very minor amount of information exists in the public arena as to the general water quality of the area." Although nitrate and arsenic are briefly mentioned, they do not include the required descriptions. None of the other contaminants were mentioned in the Plan.	n
Describe likely Climate Change impacts on their region as determined from the vulnerability assessment.	38	y/n	y	Chapter 6 / 6-33	Section 6.8 Climate Change	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	y			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 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	y	Chapter 15 / 15-2	Table 15-1 Plan Objective Measurement Method	y

IRWM Plan Standard: Plan Objectives				Overall Standard Sufficient		
Requirement		Included		Evidence of Plan Sufficiency	Yes 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	Potential Changes in Runoff and Recharge	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	"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
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	Section 14.5.5 Consideration of Greenhouse Gas Emissions in Project Benefits (Impacts Analysis) Table 14-1: Urban Water Efficiency Strategy used to reduce energy use. No mention of energy embedded in water use.	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, and neither option was considered to support plan objectives.	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 (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	Sufficient
						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	Sufficient	
From IRWM 2016 Guidelines	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.		Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Contains structure and processes for developing and fostering integration ¹ : <ul style="list-style-type: none"> - 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. <ul style="list-style-type: none"> •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. <ul style="list-style-type: none"> •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		None mentioned 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	Sufficient
		y/n	y			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.	n
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	Section 15.1 Technical Analysis and Plan Performance Evaluation: "In order to facilitate future evaluation procedures, the measurement methods are presented in Table 15-1 along with the IRWM Plan objective."	y
Contain a methodology that the RWMG will use to oversee and evaluate implementation of projects.	40	y/n	y	Chapter 14 / 14-21	"The project sponsor is responsible for development of the project and for developing the monitoring and reporting program(s) necessary to define the degree of satisfaction of intended project goals. The project sponsor is also responsible to convey such information to the IRWM RWMG and Stakeholders Advisory Group as is necessary to clearly define project benefits and required progress as against pre-agreed to benchmarks." Provides list of minimum elements of a project monitoring and reporting program.	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	"The functions of oversight and evaluation have as their primary objectives monitoring and evaluating the success and generated benefits of a project, that the project is being operated to an optimum level and to insure compliance with applicable rules, regulations, ordinances and laws." Section 14.7.2 Project Monitoring Elements	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		No
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	n		No data needs mentioned	n
Describe typical data collection techniques	59 - 60	y/n	y	Chapter 15/15-4	Section 15.2.2 Data Collection Although they mention agencies that have collected data, they do not describe any data collection techniques.	n
Describe stakeholder contributions of data to a data management system	59 - 60	y/n	y	Chapter 15 / 15-4	Section 15.2.2 Data Collection: "Data is generated from a number of sources."	y
Describe the entity responsible for maintaining data in the data management system	59 - 60	y/n	y	Section 15.2.3	At the current time, with the governance of the IRWMP residing with KDWCDC, KDWCDC assumes the responsibility and lead role position of maintaining their databases...transition is occurring to other agencies?	y
Describe the QA/QC measures for data	59 - 60	y/n	n		No QA/QC measures for data mentioned	n
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	Data sharing between agencies mentioned.	y
Explain how the Data Management System supports the RWMG's efforts to share collected data	59 - 60	y/n	y	Section 15.2	"The Kaweah Delta Water Conservation District (KDWCDC) currently maintains an extensive database in which is contained information necessary to support operating their numeric groundwater model and in preparation of the various reports which it currently publishes."	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	Section 15.2.5 Interface with State Database Systems	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	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	Section 14.3.4- Ongoing Support and Financing: "Financing of costs related to IRWMP activities are based on a dividing process with the principal burden of the cost being assumed related to the IRWM Plan by KDWCD." Section 14.7.1- Oversight and Implementation of Projects	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	Section 14.3.4- Ongoing Support and Financing Section 14.1.5- Benefits and Impacts to DACs and Other Parties: "(3) Funding Opportunities- The forum created by the IRWMP process offers specific opportunity to information regarding funding to be provided and further offer unique opportunity to coordinate projects otherwise difficult to tie together." Section 9.2 Regional Acceptance Process: "Further, that KDWCD was an eligible applicant to apply for Round 1 implementation funding made available through the passage of Proposition 84."	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	Table 13-1 Current Project List	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	n	Chapter 2/2-18+Section 14.3.4	"Whether it is in the form of attendance, document generation, document review and comment, project generation, project evaluation, local share funding or funding of application costs, support has been proven to exist." Although potential/known funding is mentioned, there is no explanation to the certainty or longevity of the funding.	n
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	"#11: Operation, maintenance, repair and replacement considerations including estimates of costs, methods of funding those costs and indication if a Proposition 218 proceeding must be completed to secure an adequate revenue source."	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	Sufficient
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	Section 2.2.6 Technical Analyses: "There have been numerous technical analyses and evaluations over time within the Kaweah River Basin that have been instrumental in shaping the direction, emphasis, and priorities of water management activities for the IRWM Plan objectives and their contribution to Kaweah River Basin understanding from the perspective of science and management." Section 15.1- Technical Analysis and Plan Performance Evaluation	y

(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	Section 11.1 Planning Framework: includes urban water management plans, groundwater management plans, water shortage contingency plans, etc.	y
Describe the dynamics between the IRWM plan and other planning documents	41	y/n	y	Chapter 11 / 11-1	"In addition to the traditional water management planning tools, as have been outlined in the chapters previous to this chapter, there are a number of other planning instruments which are critical elements to proper water management planning..."	y
Describe how the RWMG will coordinate its water management planning activities	41	y/n	y	Chapter 12 / 12-1	"As has been the case through history of water management planning in the Kaweah River Basin, interested parties have gathered together in a number of venues to evaluate common goals and objectives and to formulate plans to cooperatively implement projects and coordinate management of water supplies."	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	"The GMP is a vital element of the KDWCD IRWMP as it is one of the strongest stakeholder efforts and with proven results within the Kaweah River Basin." "Therefore, groundwater resources must be managed to ensure sustainability which is the expression of balance between extraction and recharge. As a significant step in the pursuit of this objective, the KDWCD has developed and implemented a groundwater management plan which is SB I 93 8 compliant." "The KDWCD has assisted in the preparation of several urban stormwater management plans." Section 11.2.2 Stormwater Management Programs. Please mention how the contents of the updated SWRMP will be integrated into corresponding chapters of IRWM plan in future updates.	y

IRWM Plan Standard: Relation to Local Water Planning				Overall Standard Sufficient	Yes
Requirement		Included		Evidence of Plan Sufficiency	Sufficient
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 "Additional constraints to recharge related programs include recognition of third-party impacts in any planning process and increased participants from local agencies and landowners/growers. Discussions are ongoing with local domestic water purveying entities with respect to altering their historic non-participation in groundwater recharge related efforts due to the quantity/quality impacts on their current supply." "...it is envisioned that these [groundwater management] efforts by local agencies will continue into the future and be available as a planning tool to IRWMP participants and the associated Stakeholders Advisory Group." The plan does not mention local plans of climate change mitigation.	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.

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/n	y	Chapter 9/9-33 + Chapter 11/11-2	Section 9.4.1.25 Land Use Planning and Management 11.1.1 County and City General Plans	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	Section 9.4.1.25 Land Use Planning and Management. "The principal tool utilized in the Kaweah River Basin to overcome these differences is education."	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	Section 3.1.2 Protect and Improve Water Resources through Land Use Practices. "Whether or not the topic of planning for a climate change shift of predominantly rainfall runoff, as compared to snowmelt runoff, can be sustained over the near term remains to be seen, as does the response of land use planners to a situation wherein either considerable more storage infrastructure would have to be developed or considerably more land will experience flooding conditions than currently exist."	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	No
Requirement		Included		Evidence of Plan Sufficiency	Sufficient
IRWM 2016 Guidelines Requirement	IRWM 2016 Guidelines Page Number	y/n - Present/Not Present in the IRWM Plan. If y/n/q, qualitative evaluation needed.	Location of Standard in Grantee IRWM Plan	Brief Qualitative Evaluation	y/n
Discuss involvement of DACs and tribal communities in the IRWM planning effort	41 - 42	y/n	y	Chapter 12/12-3,5, Chapter 14 / 14-11, 18 Section 12.4.1 Stakeholder Outreach Meetings. "For some length of time, an intense series of meetings were held...to deal with the framework of project planning and project evaluation and the issue of mechanisms by which disadvantaged communities and/or disadvantaged community representatives could participate." "With the creation of the new disadvantaged communities assistance program by KDWCD, a new outreach effort will need to be created. As parties experienced with project definition and creation have learned by experience, the strongest projects are those which have the wholehearted support of the affected stakeholders. As work begins in areas which currently have no defined governance structure on which to develop water quality and water supply related projects, stakeholder outreach efforts will occur and be actively pursued in order to ensure that support for project development and project handoff at implementation occurs with the support of and with the actions of the directly affected parties."	y
Describe decision-making process and roles that stakeholders can occupy	41 - 42	y/n	y	Chapter 2/2-2,3, 8, 17 "Actions taken by the governing Board are done in conjunction with input from the Stakeholders Advisory Group." Section 2.3.2 Governance Structure Evaluation Stakeholder group discusses water related issues, gives input, etc.	y
Discuss how stakeholders are necessary to address objectives and RMS	41 - 42	y/n	y	Chapter 2/2-12, Chapter 3/3-11 "The Stakeholder Advisory Group utilized this wealth of information in the establishment of objectives, in the decision of which water resource management strategies were incorporated into the KDWCD IRWMP and the evaluation method of projects that adequately address the KDWCD IRWMP needs." Stakeholders created the objectives for this plan. "The IRWM process offers a unique vehicle to pursue and secure funding for the capital elements of projects meeting the goals and objectives of this IRWM Plan."	y

IRWM Plan Standard: Stakeholder Involvement				Overall Standard Sufficient	No
Requirement		Included		Evidence of Plan Sufficiency	Sufficient
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 "Efforts within the Kaweah River Basin to address water management issues from a single-purpose perspective have long been left by the wayside, replaced by a collaborative process which takes into account differing perspectives, over time, as additional participants have been added to the mix of parties interested in improving water management objectives." Sections 2.2.3, 2.2.4, 2.2.5 Stakeholder Advisory Group is a collaborative process as well.	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	n	Chapter 12/12-3, Chapter 12/12-4, Chapter 12/12-8 "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. Website is open to the public for involvement. "The KDWCD has a longstanding relationship with tribal community representatives in the area. Consultations take place on any project which is in the development process or, more importantly, at the threshold of construction process, to ensure coordination with tribal group representatives and to ensure protection of antiquities, sacred sites and burial sites." Email/Website available. No mention of tribe coordination on government-to-government basis- will only involve them if a project is on tribal land?	n
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	n	Chapter 12/12-8 "The KDWCD has a longstanding relationship with tribal community representatives in the area. Consultations take place on any project which is in the development process or, more importantly, at the threshold of construction process, to ensure coordination with tribal group representatives and to ensure protection of antiquities, sacred sites and burial sites." Plan does not include description of any barriers in involvement.	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 (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	n		
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	Section 2.2.3 Coordination with Tule River Basin Plan Development Section 2.2.4 Coordination with Tulare Basin JPA Development Section 2.2.5 Coordination with Southern Sierra Plan Development
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	"These participation documents became the basis for coordinated efforts with respect to input to state and federal agencies, water related plan documents issued by agencies of both the state and federal government in applications for funding of specific water resources oriented procedures and projects and in the joint funding of local projects for which there was no state or federal funding available." Section 12.4.5 Cooperation and Coordination with State and Federal Agencies

(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).