

Bay Area IRWMP Coordinating Committee

April 21, 2008
1:00 to 3:00 p.m.

Elihu Harris State Office Building, Room 12, 1515 Clay Street, Oakland, CA

Agenda

1. Roll Call of Appointed Functional Area Representatives
2. Review Agreements/Action Items from 3/21/08 Meeting
3. Major Items
 - a. Discuss approach for IRWM Plan update.
 - b. Create and prioritize a list of IRWM Plan update work items.
 - c. Providing comments from CC on proposed Prop 84 guidelines.
4. Updates
 - a. Website committee
 - b. Planning and process subcommittee
 - c. 4-Party Agreement and consultant selection status
 - d. Outreach to Tomales Bay and Coastside
5. Announcements
6. Agenda and details for next IRWMP CC meeting.

Bay Area IRWMP Coordinating Committee

Agreements and Action Items from March 21, 2008 Meeting

1. Roll Call of Appointed Functional Area Representatives

WS-WQ	WW-RW	FP-SW	Watershed	Other
	Paula Kehoe, BACWA, SFPUC	Mark Boucher, CCCFCO; Mitch Avalon, CCCFCO	Melanie Denninger, SCC; Jennifer Krebs, SFEP, ABAG; Harry Seraydarian, NBWA	Chair: Paul Helliker, MMWD; Vice Chair: Nadine Hitchcock, SCC
Brian Campbell, EBMUD; Thomasin Grim, MMWD; David Houts, Zone 7	Brian Campbell, EBMUD; Renee Webber, North Bay Water Reuse Authority & SCWA	Brian Mendenhall, SCVWD; Paul Curfman, Marin Co FC&WCD	Phil Stevens, Urban Creeks Council; Meredith Williams, SFEI; Amy Hutzal, SCC; Dale Hopkins, RWQCB	Carl Morrison, Morrison & Assoc.; Maria Pang, DWR; Jennifer Clary, CWA

2. Review Agreements/Action Items from 2/4/08 Meeting

Discussion regarding meeting dates, observation that Friday does not work for many participants, and that the fourth Monday in May is Memorial Day.

3. Major Items

a. DWR response to questions posed at January CC meeting

Maria Pang from DWR addressed the following questions, prefacing all with the statement that this information is still under development and subject to change:

1) How much funding will be available for planning grants under Prop 84?

\$30 million total statewide; \$15 million from regional allocations, \$15 million from the interregional funding (of which \$5 million is specifically for DAC.) DWR is proposing that each IRWM effort would be eligible for up to \$1M for planning, spread out over two years with two application cycles per year. No dates available yet for planning or implementation grants; guidelines expected this summer. NOTE: It was not clear whether it was \$1 million per region or per application; Maria Pang is going to check on this.

2) What is in the FY08-09 budget for implementation?

\$300M for Prop 84

\$100M for 1E

3) Can planning grant costs be reimbursed if we start working on it now and apply for funding later?

Guidelines are still in development, so it isn't clear yet. It may be that costs incurred before start of a grant contract would be allowed as cost share only.

4) Is DWR willing to help provide a facilitator for this group?

Possibly; the request would have to be coordinated with the Bay Area Water Forum, and it would only be considered in order to help with specific, targeted issues the CC needed assistance with, not as an ongoing situation. If we decide to go in this direction, we would want to coordinate with Eric Hong (DWR Local Assistance Program Supervisor).

5) Application process for 1E?

DWR is considering using the same application for Prop 84 and 1E, because both are tied to the IRWM program. Under this scenario, the applicant would need to identify which funds they are seeking. Details are still being worked out. It is also not clear whether DWR will create separate guidelines for 1E.

6) Can implementation funding be used for projects that are located outside the region?

Yes, if the region that wishes to fund the project uses a portion of their funding allocation to construct the project. No, if the region wishes to use another region's allocated funding.

b. Response from functional area representatives on next steps in updating the IRWMP

FP-SW FA choice is option #1 / #2 (seek Prop 84 planning funds when they become available). Also suggests that the CC work on policy issues in the meantime.

Watershed FA choice is #3 / #4 (move ahead with updating the Plan, using volunteer staff time and soliciting contributions from all FA's to hire a consultant.)

WW/RW FA choice is #1 / #3 (update Plan after Prop 84 guidelines are released; are prepared to contribute funding but need a written proposal to bring to BACWA's Board.)

WS/WQ FA choice is #1 / #3 (update Plan, solicit contributions from all FA's, CC and PnP group should continue work in the meantime.)

All FA's wish to further define the scope of work for updating the Plan, all agree we should continue to do whatever we can do towards the update effort (such as address DWR's comments). Three FA's are willing to contribute funds towards hiring a consultant prior to planning funds being made available.

There was discussion about creating a prioritized list of items to be worked on as well as defining the process to be used in updating the Plan. It was noted that the consultant that will soon be on board can help to scope the IRWM Plan update.

c. Brief follow-up to February 4 FA workshop

Melanie Denninger provided a brief summary of outcomes and reactions from the workshop, noting that it had provided an opportunity for all FA's to learn and begin to understand some of the other FA key issues. Paul Curfman distributed a document framing some of his observations and questions. Phil Stevens pointed out that the large number of NGO's participating in the Watershed FA actually do have the ability to effect land use decisions through grass roots efforts. Mitch Avalon said that Phil Stevens had given a compelling presentation about how endangered species (and restoration efforts) could serve as a focal point or organizing principle for integrating projects, and suggested this group might want to ask him to present the material at one of the CC meetings.

d. 2/7/08 Roundtable of Regions summit and conference calls

Paul Helliker summarized the February 7 summit meeting he attended: DWR provided some updates (but info learned today is more current), Prop 50, Step 2 applications will be reviewed by April; Leslie Friedman-Johnson spoke about the State budget and water bonds; “work groups” (legislative group is focusing on: AB 1489 (2007) – AB 1654 (2008), , DAC work group is preparing BMP’s and guidelines for DWR, contracting work group is developing a template to present to DWR, survey work group is conducting a survey of regions in order to determine how each is responding to various issues); finally, breakout groups discussed issues such as numeric targets in IRWM Plans, prioritization of Plan objectives, and regional competition. DWR stated that they want each region to have a single strategy re: dividing up Prop 84 fund allocations; if not a single IRWMP, then at least a single strategy.

e. Providing comments from CC on proposed Prop 84 guidelines

Agreed that the CC will submit comments, and the comments will be compiled by a group composed of one person from each FA. Carl Morrison will coordinate the effort and write a strawman document to circulate and begin the process, and then synthesize comments received into a final document for CC review.

- Paul Helliker will send a request asking for volunteers to participate in this effort. Carl will work with Maria Pang to accurately state planning grant funding issues we heard about today.
- Target date to get comments to DWR: early May.

4. Short updates

a. Website committee

David Houts announced that the new web site is up and running, new address is: bairwmp.org. Next steps include making the site more “browsable” for content, and beginning to post meeting notices, etc.

b. Planning and process subcommittee

Mark Boucher reported that he has distributed the project status survey, and has heard back regarding 64 of the 121 projects.

- Mark will send one last reminder to those that have not responded, and then it will become the responsibility of each FA to prod their project proponents into responding to the survey.

Thomasin Grim briefly described the work effort and resulting spreadsheet that the PnP group has developed in order to address DWR’s comments regarding the IRWMP objectives. Since there was very little time, this item was referred to the next CC meeting for discussion. The PnP group will wait until after receiving feedback from the CC before moving ahead with the work.

c. 4-Party Agreement status

Melanie reported that the RFQ has been released, the deadline for submitting SOQ’s is Monday, March 24, and it is possible a consultant contract could be in place by April 18. There are still a few outstanding contract issues, and the Scope of Work needs to be detailed for the contract.

d. Outreach to Tomales Bay and Coastside

- A meeting with the Tomales Bay Watershed Council is planned for April 24, which Paul Helliker and possibly Nadine Hitchcock are planning to attend. A meeting with the San Mateo County Coastside group will also be organized during April.

5. Announcements

No announcements.

6. Agenda and details for next IRWMP CC meeting

Next CC meeting will be held April 21, from 1-3.

Agenda items include:

Create a prioritized list of items to be worked on as part of an IRWM Plan update.

Discuss/develop process for Plan update – shall we go back to the 4 FA approach or update the Plan as a whole?

Future presentation by Phil Stevens.

Review and approve draft Prop 84 comment letter so that it may be submitted by early May.

Planning and Process Subcommittee

December 17, 2007 meeting, 10:00-12:00

14th Floor, 1515 Clay Street, Oakland, CA

Meeting Brief and Action Items (Excerpt)

By Paul Curfman /Mark Boucher 12/21/07

The following is a list of items that need to be worked on and some comments that were made during the discussion:

- i. Regional Clarification - Tomales Bay/Coastside/Napa – CC needs to continue to pursue this issue.
- ii. Tracking Proposition 84 guidelines
- iii. Defining Participation – cost sharing? Agreements? (LOMU)
- iv. Considering subregional approach
 - There were past governance structure proposals that included subregions and a steering committee.
 - This structure is similar to other IRWMP regions.
 - Regional balance in terms of funding – there needs to be a way to ensure the funding spread is balanced throughout the region.
- v. Schedule for next milestones (Tracy Hemmeter is working on this for the January 7 CC meeting)
 - This time line will help us focus on what we need to work on as a subcommittee.
- vi. Prioritization – The Project Selection Committee started something. We should continue with their work and not disband the committee.
- vii. Integration – need to continue to build integration into the project definition and selection/prioritization process.
- viii. Measureable Priorities/Objectives (performance metrics)
 - The current objectives in the Plan are more “Mom and Apple Pie” / “generic”.
 - If we break the region up into subregions we might get more focused objectives.
 - Bringing the entire Bay Area into one set of objectives may water them down.

UPDATE OF THE IRWM PLAN

- ix. REGIONAL CLARIFICATION – We need to clearly address DWR’s comments about our region’s boundaries.
- x. OBJECTIVES AND NEEDS, AND PERFORMANCE METRICS
 - Need better performance metrics with measurable objectives, and needs and requirements of each of the member agencies
 - Need to understand the requirements of each member agency
 - Choose and prioritize projects based on needs and objectives
 - Consider and/or integrate sub regional interests
 - Foster integrative projects

San Francisco Bay Area IRWMP Update Milestones and Issues
(Prepared by Tracy Hemmeter)

Milestones

Bay Area IRWMP Milestone	DWR Milestone	Date
<ul style="list-style-type: none"> • Agreement to Update Plan • Identify funding mechanism 		January 2008
Prepare/Issue RFP		February 2008
Review Consultant Proposals	Draft Guidelines, Standards, and Planning PSP	March 2008
Hire Consultant to Update IRWMP		April 2008
Comment on Draft Guidelines		May 2008
	Finalize Guidelines and Planning PSP; Finalize Implementation Grant Process	July 2008
Submit Planning Grant Application ???		September 2008
Finalize IRWMP	Implementation PSP	December 2008 - ???
Adopt IRWMP/Submit Step 1 Implementation Grant Application		January 2009 - ???

Coordinating Committee Issues

General

- Will the Bay Area update the IRWMP?
- How will the Plan update be funded?
- Who will contract with the IRWMP update consultant?
- Who will prepare the RFP? Who will review proposals?

Regional Water Management Group/Governance

- Should the Coordinating Committee break into two groups – one technical and one policy?
- Who has decision making authority?
- What is the definition of a participant and what do they need to bring to the table?
- Are there different levels of participants?
- What are the roles and responsibilities of different participants?
- Is a formal MOU necessary?
- How will the CC oversee IRWMP implementation? What is their oversight responsibility with or without infusion of State funding?

Regional Description

- Resolve overlapping regional boundaries/split counties – Napa, Solano, Contra Costa
- Who is and isn't participating? Does everyone concur with being/not being included?

Objectives

- Objectives need to be top-down, based on goals of IRWMP
- Specific and measurable objectives
- Identify the direction of the effort, and aim, or an end of action – what is Region trying to achieve?

Integration

- Move away from functional areas?

Regional Priorities

- Project Selection – Sub-regional or by functional area?
- When are projects added to the plan?
- Is the process developed by the PNP committee approved?
- Select projects based on what is in the best interest for the region rather than by participants

Implementation

- What requires re-adoption and what is ongoing implementation?
- Who will oversee implementation? What is the long-term institutional structure to ensure implementation of the IRWMP?
- What is the process for monitoring performance of the IRWMP and updating the IRWMP as necessary?

Technical Analysis and Plan Performance

- How does data derived from the individual project feed back into the IRWMP planning cycle and possibly alter implementation of the remaining projects?

Financing

- Long term financing for IRWM administration and implementation is not addressed in specific terms
- The IRWMP does not identify the funding sources for ongoing support, operations, and maintenance of projects.

Other

- How will the IRWMP address climate change?
- What are interests in/how will the IRWMP address Regional Flood Management?
- What are interests in/how will the IRWMP integrate land use and water management?

Text in Arial font is from DWR's February 2007 comments on the Bay Area IRWMP. The comments are arranged to align with Prop 50 IRWMP Standards.

Text in Times New Roman font is from the Prop 50 IRWMP Round 2 Standards.

Text in Calibri font is from comments on the Prop 50, Round 2, Step 1 application.

IRWM PLAN STANDARDS

Looking to the future for Prop 84, eligible projects must implement an IRWMP that does the following:

- 1) Identify and address the major water related objectives and conflicts within the region;
 - 2) Considers all the resource management strategies identified in the California Water Plan;
 - 3) Use an integrated, multi-benefit approach to project selection and design; and
 - 4) Plans shall include performance measures and monitoring to document progress toward meeting plan objectives
- A. **Regional Agency or Regional Water Management Group** – Describe the regional water management group **or** regional agency responsible for development and implementation of the Plan. Include the member agencies and organizations and their management responsibilities related to water. Demonstrate that all agencies and organizations, including but not limited to, public agencies, not-for-profit organizations, and privately owned water utilities regulated by the Public Utilities Commission, that were necessary to address the objectives and water management strategies of the Plan were involved in the planning process.

Governance— With the additional explanation that you have provided, we are on a path toward beginning to have a better understanding of the overall organizational structure. However, if others review the document in the future, scoring may be compromised if there is some confusion and lack of understanding of the organizational structure. I think it would be useful to include some more detailed information on your specific governance structure. It may be that an alternate explanation would help others in their understanding. The current governing structure is identified for the development of the initial IRWMP; however, the structure does not appear to allow for continued development and oversight of the IRWMP. Continued and active oversight is very important in the process as well as the identification of specific roles, responsibilities and a clear understanding of the decision making authority. We think it would be beneficial to identify the process of how the IRWMP will be updated and improved upon once projects are implemented and how the review of the projects and impacts are evaluated? How does data derived from the individual projects feed back into the IRWM planning cycle and possibly alter the implementation of the remaining projects? What would the role and decision making authority of the Coordinating Committee be during implementation? What is their oversight responsibility with or without the infusion of State capital funds? At present, the IRWMP appears to stop if State funds do not materialize. The goal of IRWMP planning should use an integrated, multi-benefit

approach to project selection and design. The IRWMP should drive the selection of appropriate projects (top down) rather than the projects directing the plan (bottom up). There appears to be no governing structure to hold the parties together to implement the IRWMP without State funds. We are not looking for a specific model of governance. We are interested in governance structure that assures the IRWMP implementation beyond the grant program funding. We will want to add a separate Governance section to all IRWMP's in the future.

- B. **Region Description** – Explain why the region is an appropriate area for integrated regional water management. Describe internal boundaries within the region (boundaries of municipalities; service areas of individual water, wastewater, and land use agencies, including those not involved in the Plan; groundwater basin boundaries, watershed boundaries, county boundaries, etc.), major water related infrastructure, and major land-use divisions. Describe the quality and quantity of water resources within the region, including surface waters, groundwater, reclaimed water, imported water, and desalted water. Describe water supplies and demand for a minimum 20-year planning horizon. Describe important ecological processes and environmental resources within the regional boundaries and the associated water demands to support environmental needs. Describe the social and cultural makeup of the regional community; identify important cultural or social values. Describe economic conditions and important economic trends within the region.

In certain cases, individual agencies or organizations may participate in different regional efforts depending on geography, Plan objectives, or other relevant factors. For such cases, the application should include an explanation of why participation in various regional efforts is appropriate.

A very important step in the IRWMP process is the identification of your region and demonstration why the region identified is appropriate. While a region is identified, it would be beneficial if additional discussion could be provided regarding a justification why this region was selected and is appropriate for the IRWMP. In the document it is stated that for the purposes of this IRWMP, the Bay area region is defined by the jurisdictional of the San Francisco Bay RWQCB. A short discussion is provided that states that the region is defined as the RWQCB region 2 boundary and is a physically based watershed boundary that includes lands that drain to common receiving waters. However, other areas outside the boundary do drain to the same common receiving waters but are not included in the region. It would be useful to provide additional explanation of why the region you selected is the most appropriate. It would be useful to reference the California Water Plan and how your defined region may relate to or may be consistent with the Water Plan. It is not clear regarding the relationship to the split portions of counties (i.e. Napa, Solano, Contra Costa) to the IRWMP and has significant outreach occurred with these counties that demonstrates that they agree with dividing the county and/or being included in this region (i.e. Montara)? Is there any water districts within the region that you have identified that are not participating in your efforts? From looking at your region map it leads one to assume that everyone within your region is participating. If there are voids in your region they should be identified and explained. You may wish to add some additional discussion in this section regarding those issues. A question to consider may be, will this splitting of counties add to conflicts in the region? Also it is important to identify if there are any adjacent region overlaps with other IRWMPs. Overlapping regions can create conflicts. Does this county division create

additional issues for the county in determining what to do with the portion of the county that is not included in this region? Will the split county be participating in two separate IRWMP's? A discussion of each individual split county may be beneficial that includes a description of how the remaining portion of the county will be addressed, how the remaining portion of the county will be addressing IRWM planning, and who they will be participating with. It is important to demonstrate that there is no overlap of IRWMP planning areas. Additional discussion and demonstration of the counties acceptance in the region could be discussed. It is important to remember that the question of "what is your region" is a very important question and who is and is not participating in the region that you have identified.

However, there is no recognition or mention of Tomales Bay.

- C. **Objectives** – Identify Plan objectives and the manner in which they were determined. The Plan must address major water related objectives and conflicts within the region, including at a minimum, water supply, groundwater management, ecosystem restoration, and water quality.

The objectives identified in the IRWMP are general and could be significantly improved by identifying the direction of the effort, an aim, or an end of action. They are somewhat broad in nature and do not identify and describe a clear achievable measurement of success or comparison. The objectives that are presented are general in nature, broad reaching, and appear to be subsets of the main goals rather than objectives. Objectives should be clearly enunciated with specific and targeted results or actions that related back in meeting the goals and objectives of the IRWMP. Looking toward Prop 84, your plan will need to include performance measures and monitoring to document progress toward meeting specific plan objectives. So a clear definition of objectives that are measurable objectives would be beneficial. Specific performance measures and appropriate monitoring to evaluate progress toward meeting plan objectives should be discussed. Objectives should be driven from the top down rather than from the bottom up. There has been a lot of discussion that your process is a bottoms-up approach. Projects are identified separately and then feed up to the plan. We view the IRWMP process as a top down approach that leads the selection on the projects based on what is in the best interest for the region rather than the allocation of projects based on the number of individual participants.

- D. **Water Management Strategies** – Document the range of water management strategies considered to meet the objectives. Strategies to be considered include but are not limited to:

Table 2 – Water Management Strategies**

◆ Ecosystem Restoration*	◆ Conjunctive use
◆ Environmental and habitat protection and improvement*	◆ Desalination
◆ Water Supply Reliability*	◆ Imported water
◆ Flood management*	◆ Land use planning
◆ Groundwater management*	◆ NPS pollution control
◆ Recreation and public access*	◆ Surface storage
◆ Storm water capture and management*	◆ Watershed planning
◆ Water conservation*	◆ Water and wastewater treatment
◆ Water quality protection and improvement*	◆ Water transfers
◆ Water recycling*	
◆ Wetlands enhancement and creation*	

* Pursuant to CWC §§ 79562.5 and 79564, these water management strategies must be considered to meet the minimum Plan Standards.

** To be eligible for future funding pursuant to California Public Resources Code § 75026(a), Plans will need to consider all of the resources management strategies identified in the California Water Plan (<http://www.waterplan.water.ca.gov/>).

The water management strategies to be used are identified and the importance and existing effort are summarized. A discussion of the strategies, the course of action by its hypothesis that a certain future position offers an advantage for acquiring some designated gain, was noticeably absent for many of the strategies listed. Discussion on integration and synergistic effects of the water management strategies was largely conceptual in nature. Example or elaboration on how one or more existing or proposed projects utilize the strategies cited would have been more useful than just identifying the strategies addressed.

E. Integration – Present the mix of water management strategies selected for inclusion in the Plan and discuss how these strategies work together to provide reliable water supply, protect or improve water quality, and achieve other objectives. Include a discussion of the added benefits of integration of multiple water management strategies, as compared to stand alone alternatives.

Projects that may be funded pursuant to Prop 84 must be consistent with an adopted IRWMP must provide multiple benefits, and must include one or more of the following project elements:

- (1) Water supply reliability, water conservation and water use efficiency;
- (2) Storm water capture, storage, clean-up, treatment, and management;
- (3) Removal of invasive non-native species, the creation and enhancement of wetlands, and the acquisition, protection, and restoration of open space and watershed lands;
- (4) Non-point source pollution reduction, management and monitoring;
- (5) Groundwater recharge and management projects;
- (6) Contaminant and salt removal through reclamation, desalting, and other treatment technologies and conveyance of reclaimed water for distribution to users;
- (7) Water banking, exchange, reclamation and improvement of water quality;
- (8) Planning and implementation of multipurpose flood management programs;
- (9) Watershed protection and management;
- (10) Drinking water treatment and distribution; and
- (11) Ecosystem and fisheries restoration and protection.

If you have not done so already, I would suggest that you evaluate and compare each project with each of the above elements and demonstrate where each project provides multiple benefits.

- F. **Regional Priorities** – Include short-term and long-term priorities for implementation of the Plan. Discuss the process used to determine the regional priorities and the process for modifying priorities in response to regional changes.

A discussion on project inclusion into the IRWMP and its priority with respect to how each project will contribute to meeting the overall IRWMP objectives would benefit by additional detailed discussion.

The criterion is addressed but not thoroughly documented. The IRWMP describes the prioritization process, priorities for regional implementation, and a process for modifying the priorities. However, the regional priorities for implementation lack detail.

- G. **Implementation** – Identify specific actions, projects, and studies, ongoing or planned, by which the Plan will be implemented. Identify the agency(ies) responsible for project implementation and clearly identify linkages or interdependence between projects. Demonstrate economic and technical feasibility on a programmatic level. Identify the current status of each element of the Plan, such as existing infrastructure, feasibility, pilot or demonstration project, design completed, etc. Include timelines for all active or planned projects and identify the institutional structure that will ensure Plan implementation.

It appears that the IRWMP does not have a means to implement projects identified. Decision making on the implementation of the projects appears to depend on the project proponent and is largely independent from the IRWMP or its development. There appears to be no mechanism, formal governance structure, or process established in the IRWMP that allows for monitoring the performance of the IRWMP implementation of changes to the IRWMP that may be necessary in the future, although it is envisioned that the IRWMP will serve as a living document and be updated as necessary. Existing governance structures is anticipated to be enforce until only January 1, 2007 after which time discussion on a suitable long-terms institutional structure will be addressed. A clear discussion of the governance structure that describes roles, responsibility, and more importantly the decision making authority should be addressed.

The criterion is not fully addressed. Beyond the Letter Of Mutual Understanding and the Coordinating Committee, there is no long-term institutional structure in place to ensure full implementation of the IRWMP, and for monitoring plan and project performance. As such, the IRWMP states that a formal organization may be created later to oversee implementation of the projects. Further, the IRWMP states that local project sponsors are responsible for project implementation. The economic and technical feasibility of projects are briefly discussed on a per project basis and project time lines are provided. Also, the linkage/relationship between the proposed projects is presented briefly in the projects' status, but should have been more fully described.

- H. **Impacts and Benefits** – Discuss at a screening level the impact and benefits from Plan implementation. Include an evaluation of potential impacts within the region and in adjacent areas from Plan implementation. Identify the advantages of the regional plan; including a discussion of the added benefits of the regional plan as opposed to individual local efforts. Identify which objectives necessitate a regional solution. Identify interregional benefits and impacts. Describe the impacts and benefits to environmental justice or disadvantaged communities. Include an evaluation of impacts/benefits to other resources, such as air quality or energy.

Long-termed impacts do not appear to be addressed. The majority of the discussion (pages H-2 through H-11), focuses on the impacts and benefits of IRWMP projects, broken down into 26 sections pertaining to the Water Management Strategies listed in the Guidelines. Specific IRWMP project benefits are discussed in table form pages H-13 through H-21 and project impacts are discussed in a general manner on page H-12 (Impacts cited are generally temporary impacts associated with construction). Impacts and benefits related to EJ and DACs are described as not being completed to date (see page H-22). While regional benefits (impacts?) are discussed on page H-24, a discussion of *interregional* impacts and benefits cannot be located, nor can a discussion of impacts and benefits to other resources. One interregional benefit claim could be the benefit to areas of origin from the claimed decrees in imported water due to IRWMP implementation.

Critical water quality needs for disadvantaged communities within the region - You may wish to consider including a separate section that describes how you have addressed critical water supply needs for disadvantaged communities within the region.

The criterion is not fully addressed. The IRWMP includes a discussion of the project impacts and benefits related to the each of the Water Management Strategies. A list of all the proposed short term projects and their benefits are provided. The IRWMP briefly discusses the impacts and benefits to DACs. The IRWMP states that sufficient analysis of the potential benefits and impacts of projects with respect to DACs has not been completed to date. There was no discussion relating advantages of regional vs. individual local efforts and interregional benefits and impacts.

- I. **Technical Analysis and Plan Performance** – Include a discussion of data, technical methods, and analyses used in development of the Plan. Include a discussion of measures that will be used to evaluate Project/Plan performance, monitoring systems that will be used to gather performance data, and mechanisms to adapt project operations and Plan implementation based on performance data collected.

Data, technical methods, and analysis used in the selection of water management strategies are absent. Existing data gaps were not identified. The IRWMP does not introduce or adopt any existing monitoring efforts that will be used to evaluate project/IRWMP performance. Although existing monitoring system was listed, its relationship to the IRWMP is vague and uncertain. Results of those efforts do not appear to have any direct linkages to the IRWMP performance and would serve as advisory information. As there are no institutional structure

(governance) mechanisms to adapt project operation or IRWMP implementation, it is difficult to determine how data collected will be utilized.

Performance measures and monitoring to document progress toward meeting plan objectives –IRWMPs would benefit greatly by including performance measures and monitoring to document progress toward meeting plan objectives.

The criterion is addressed but not supported by thorough documentation. The IRWMP indicates that the coordinating committee has not committed to using any specific monitoring programs for assessing IRWMP performance. The IRWMP discusses in general terms the methods used to collect technical analysis and performance assessment data. The IRWMP does discuss the possible data gaps. The IRWMP does not document how the technical data were collected and analyzed. Measures used to assess performance of the individual project are listed.

- J. **Data Management** – Include mechanisms by which data will be managed and disseminated to stakeholders and the public, and include a discussion of how data collection will support statewide data needs. Assess the state of existing monitoring efforts for water quantity and water quality, and identify data gaps for which additional monitoring is needed.

If the Plan includes a water quality component, include a discussion of the integration of data into the State Water Board's SWAMP and Groundwater Ambient Monitoring and Assessment (GAMA) Program. [Appendix E](#) provides a listing of web links for accessing information on the State Water Board's statewide data management strategies.

Individual project proponents will be responsible for data collection and will submit on a quarterly basis to each functional area Technical Coordinating Committee (TCC). Annually, the TCC will compile the data and submit its finding to the IRWMP Coordinating Committee (IRWMP CC). Periodically the IRWMP CC will assess how each project progress toward achievement of each functional area's goals and objectives and update the IRWMP as needed. Dissemination of data to the public will be established via an online database. Data gaps are presented in this criterion (Table J-2) though not in the Technical Analysis and Plan Performance criterion. A discussion of existing monitoring efforts is brief and the reader is referred to a different criterion for a further explanation (see page J-4). Discussion on how the data collection will support statewide needs is absent except that data collection will be required to be compatible with SWAMP and GAMA.

The criterion is not fully addressed. The IRWMP briefly discusses how the data will be collected, managed, and distributed to the stakeholders and public. The IRWMP indicates that the collected data will be comparable with the applicable statewide data collection programs such as SWAMP and GAMA, but does not provide any specifics about integration of data or how data would support statewide data needs. The IRWMP does not discuss the existing monitoring efforts for water supply or water quality. Rather, states that there are several monitoring programs that currently exist that may be leveraged to support the IRWMP performance assessment.

- K. **Financing** – Identify beneficiaries and identify potential funding/financing for Plan implementation. Discuss ongoing support and financing for operation and maintenance of implemented projects.

Beneficiaries of IRWMP implementation are discussed. Potential funding sources for projects are presented in Table K-1. Potential project funding sources includes Prop 50 Chapter 8 funds and project proponent funds. Funding for the IRWMP implementation is not directly addressed (see page K-2). The IRWMP does not have a mechanism to fund oversight of implementation past existing funding. Oversight and O&M cost will be the responsibility of the project proponents. The effectiveness of the IRWMP past current development is uncertain.

The criterion is marginally addressed. The IRWMP indicates that the Bay Area population, local project sponsors, and stakeholders are the beneficiaries of IRWM implementation. The IRWMP lists potential costs of the individual projects, but does not identify the funding sources for ongoing support, operations, and maintenance of the projects. Long-term financing for IRWM administration and implementation is not addressed in any specific terms except that it would most likely rely on in-kind services or additional potential grant funds.

- L. **Statewide Priorities** – Identify issues of statewide significance or State agency priorities that will be met or contributed to by implementation of the Plan, Proposal, or specific projects. Describe how the Plan, Proposal, or specific projects were developed to meet issues of statewide significance or State agency priorities.

TMDL, WMI, and NPS priorities are discussed in greater detail than in the June draft IRWMP. Individual projects are identified for specific Statewide Priorities and include a discussion on how the project will support Statewide Priorities. The degree of certainty that the proposal will adequately address the Statewide Priorities is clearer than presented in the June document. A remaining concern is will recycling and water conservation projects actually reduce the demand for imported water? While statewide priorities were considered in the evaluation process previously, it is expected that the term Statewide Priorities will be modified in the future and replaced with program proposal preferences. Prop 84 states that DWR shall give preference to proposals that satisfy specific criteria. We expect that statewide priorities will be redefined. DWR will give preference to proposals that satisfy the following criteria: (1) Proposals that effectively integrate water management programs and projects within a hydrologic region identified in the California Water Plan; the Regional Water Quality Control Board region or subdivision or other region or sub-region specifically identified by the department. (2) Proposals that effectively integrate water management with land use planning. (3) Proposals that effectively resolve significant water-related conflicts within or between regions. (4) Proposals that contribute to the attainment of one or more of the objectives of the CALFED Bay-Delta Program. I would suggest revisions to this section that focus and discuss the criteria identified in Prop 84

- M. **Relation to Local Planning** – Discuss how the Plan relates to planning documents and programs established by local agencies. Demonstrate coordination with local land-use planning decision-makers. Discuss how local agency planning documents relate to the IRWM strategies and the dynamics between the two planning documents. Discuss the linkages between the Plan and local planning documents.

Local agency planning documents are discussed, as is their relation to the IRWMP; however, the dynamics of the IRWMP in relationship to local planning would benefit from a two-way flow of information. Regional water management issues are currently reflective of local planning needs. However, as projects are implemented, local planning should reflect the regional water management issues and solutions. This is not reflected in the IRWMP.

Integration of water management with land use planning – We would be looking for additional discussion on land use planning. Preference will be given to proposals that effectively integrate water management with land use planning. This would be more than stating that the land use planning process is incorporated through a bottom up approach. We are looking for how the proposal will effectively integrate water management with land use planning. This may be best discussed in a separate section.

The criterion is not fully addressed. The IRWMP does not explain how local planning governments and their documents relate to the IRWMP, or how regional water management issues and solutions will be represented in local planning efforts. The IRWMP also does not explain how the proposed list of priority projects are related to the various planning documents developed by local agencies. The IRWMP only states that water resource management is an integral part of any planning document. The IRWMP discusses extensive targeted outreach efforts undertaken to engage the land-use decision makers in the IRWM planning process, but lacks detail on the outcome of the meetings.

- N. **Stakeholder Involvement** – Identify stakeholders included in developing the Plan. Identify how stakeholders were identified, how they participate in planning and implementation efforts, and how they can influence decisions made regarding water management. Include documentation of stakeholder involvement such as inclusion of signatory status or letters of support from non-agency stakeholders, i.e. those who have not “adopted” the Plan. Include a discussion of mechanisms and processes that have been or will be used to facilitate stakeholder involvement and communication during implementation of the Plan. Discuss watershed or other partnerships developed during the planning process. Discuss disadvantaged communities within the region and their involvement in the planning process. Discuss efforts to identify and address environmental justice needs and issues within the region. Identify possible obstacles to Plan implementation.

Definition of Disadvantaged Communities (DACs) and Environmental Justice (EJ) based on racial profiling should be reconsidered. Projects should be addressing the goals and objectives of the IRWMP with relation to one or more of the water management strategies. Projects that seek to improve DACs and/or address EJ concerns should have a higher consideration or priority than similar project without such consideration; however, all of the projects should fundamentally address the water management issues in the region. A statement, definition, and/or policy about DACs and EJ should be identified in the IRWMP. The lack of an overall framework for continuous development of the IRWMP renders the effectiveness of the planning past the current development in question. State and federal coordination is discussed. Table O-1 depicts possible State and federal regulatory permits

regarding IRWMP implementation. Specific projects that will improve the infrastructure within disadvantaged communities should be identified if available.

The criterion is addressed but not thoroughly documented. The IRWP includes a list of stakeholders, explains how they were identified, and participated in IRWMP development. Processes for stakeholder involvement and coordination including workshop attendance lists, outreach materials, workshop presentations, and comments are presented. DACs and EJ concerns are identified. Obstacles to IRWMP implementation are discussed. Coordination with state and federal agencies is also discussed. DAC participation in the planning process and ability to influence decisions has not been documented.

The criteria is not fully addressed. The IRWMP states that there are no cities or counties that meet the Prop 50 Guidelines DAC definition, but some isolated communities within larger municipalities are disadvantaged. As such, in the IRWMP DACs are identified and mapped via two criteria: segments of larger municipalities with less than 80% MHI and minority populations exceeding 30% of total population. Locations of wastewater treatment facilities and flood-prone areas in the region are mapped to identify potential environmental justice concerns. However, specific project benefits to DACs are not identified. The IRWMP indicates that the criterion is not fully developed and that they intend to initiate and provide on-going outreach to DACs and will address environmental justice concerns during implementation.

- O. **Coordination** – Identify State or federal agencies involved with strategies, actions, and projects. Identify areas where a State agency or other agencies may be able to assist in communication, cooperation, or implementation of Plan components or processes, or where State or federal regulatory decisions are required for implementation.

Other

You may wish to look toward Prop 84 and consider addressing in more detail the following:

Resource management strategies identified in the California Water Plan –

Each eligible project should consider all of the resource management strategies identified in the California Water Plan, Volume 2. It may be beneficial to include a separate section on the IRWMP that provides a discussion on this topic.

Regional Flood Management

With the passage of Prop 1E you may wish to review the portion of your plan related to regional flood risk and management. This is currently a developing process at DWR. However, it would be beneficial to keep track of developments in this area.

**Bay Area IRWMP Coordinating Committee
Draft Comments Regarding Proposition 84 Guidelines**

April 16, 2008, draft

1. **Planning Grants.** Consideration should be given to developing planning grant guidelines that will encourage cooperation of regional planning efforts within a funding area. Simply awarding planning grants to any qualified regional planning effort may well result in a fracturing of integrated planning in a funding area instead of prompting cooperation among multiple planning efforts. In addition, the amount of a planning grant should be proportionate to the overall allocation to the funding area and, in the case of a subregion if such a grant is awarded, the size, population and complexities of such subregion within the funding area.
2. **Complexity of Regions.** In funding areas where there are competing regional planning efforts, both planning and implementation grant guidelines should take into consideration the complexity of the region, meaning its geographical size, population, number of political entities and agencies, etc.
3. **Funding for disadvantage communities.** Bond funds specifically designated for disadvantaged communities should be awarded to the pertinent IRWM planning entity to ensure that any DAC activity funded with such monies is coordinated with such IRWM planning entity. The DWR guidelines should also require strict accountability standards to ensure that DAC designated funding is appropriately spent on DAC planning efforts and projects.
4. **Relation to local planning.** General plans are not required to have a water element. Several legislative attempts have been made to include a water element in general plans but have failed. Senate Bills 221 and 610 were successful in requiring large developments to demonstrate the availability of a water supply. But most development in the state does not fall under the requirements of these two bills. IWMP Plan guidelines should recognize that water resources management agencies have no real control over land-use decisions. But water resources management agencies could be required to expend a certain amount of effort to reach out to general government entities that make land-use decisions in an attempt to develop a greater relation between regional planning and local land-use planning. This could result ideally in land-use agencies voluntarily adding a water element in their general plans or at least more thoroughly evaluate with the local water agency the realistic availability of a sustainable water supply as general plans are updated. A model of the extent of the outreach that could be expected by IRWM planning regions could be what was accomplished by the Santa Ana Watershed Project Authority (SAWPA). An example of materials used for such outreach efforts are those prepared by the North Bay Watershed Association (NBWA) that included the Local Government Commission's Ahwahnee Principles.
5. **Use of implementation grant funds.** IRWM guidelines should indicate that implementation grants should primarily be used to fund multiple-purpose projects for which there is no adequate or realistic local source of funding.

From IRWMP	NOT from IRWMP	From IRWMP	NOT from IRWMP		
			PnP Consensus	Primary or Secondary	Comments from 2/11/08 PnP meeting. <i>(italics 3-3-08 mtg)</i>
Regional Goal	Goal Category	Objectives	Measurable?		Comments
I. Contribute to the promotion of economic, social, and environmental sustainability	A. Providing Community Involvement, Recreation, and Education	1. Provide trails and recreation opportunities	Yes	S	<i>Need a clear link back to the bond language. Combine or move elsewhere.</i>
		2. Protect cultural resources	NO	S	Project Specific CEQA Requirement; the objective is also too vague - if we're being asked to proactively identify and protect these resources, that's how it should be stated.
		3. Increase community outreach and education for watershed health	Yes	P	<i>Combine 3,4 & 5</i>
		4. Maximize community involvement and stewardship	No	P	Vague; Duplicative; "maximize" is a problematic word. <i>Combine 3,4 & 5</i>
		5. Achieve community awareness of local flood risks, including potential risks in areas protected by existing projects	Yes	P	Duplicative <i>Combine 3,4 & 5</i>
		6. Consider and address disproportionate community impacts	Yes	P?	Duplicative. This needs more definition. What is the limit in the water resources world?
	B. Promoting Environmental Stewardship	1. Avoid, minimize, and mitigate net impacts to environment	NO	P	Poor wording, delete "avoid". Needs to be positive, not "avoiding". Concept needs to be worded better.
		2. Maintain and promote economic and environmental sustainability thru sound water resources management practices	NO	P	<i>This sounds more like a goal than an objective (Present as a guiding principle instead?)</i>
		3. Reduce energy use and/or renewable resources where appropriate	Yes	P	<i>Attach to the Climate Change goals</i>
		4. Minimize solid waste generation/maximize reuse	Yes	P	<i>Collaborate with other agencies/partners whose mission is to accomplish this: a new objective?</i>
		5. Engage public agencies, businesses, and the public in stormwater pollution prevention and watershed management, including decision making.	Yes	P	
	C. Promoting Fiscal Stewardship	1. Maximize external support and partnerships	Yes	P	Vague.
		2. Maximize ability to get outside funding	Yes	P	Duplicative
		3. Maximize economies of scale and governmental efficiencies	Yes	P	(For example, invasive species mgmt across jurisdictional boundaries.)
		4. Secure funds to implement solutions	Yes	P	
	D. Promoting balance among FAs	1. Balance needs for all beneficial uses of water	NO	P	Good concept. <i>Is this an implementation/guiding principle?</i>

II. Contribute to improved supply reliability	A. Meeting Water Supply Demand	1. Meet future and dry year demands	Yes	P	In the region as well as outside the region.; should this be a goal? It seems like the objectives below are strategies to achieve this measure?
		2. Maximize water use efficiency	Yes	P	
	B. Preserving/Enhancing Supply Opportunities	1. Minimize vulnerability of infrastructure to catastrophes and security breaches	Yes	P	
		2. Maximize control within the Bay Area region	NO	P?	Not clear. Water supply or conjunctive use. Combine with II.B.6. Tracy H. may be able to supply some measures. <i>Reword: Reduce dependency on imported water. Subset of 6?</i>
		3. Protect against overdraft	Yes	P	
		4. Provide for groundwater recharge while maintaining groundwater resources	Yes	P	Some groundwater basins not well defined.
		5. Maintain a diverse portfolio of water supplies to maximize flexibility	Yes	P	Consider local supplies; combine with II.A.1. Add: "...and reduce dependence on imported water."
	C. Improving/Protecting Water Quality with Respect to Supply	1. Preserve highest quality supplies for highest use	Yes	P	This is an action, not an objective.
		2. Increase opportunities for recycled water use consistent with health and safety	Yes	P	Combine with A.2 or a subset of A.2
	D. Funding	1. Secure funds to implement solutions	Yes	P	
III. Contribute to the protection and improvement of hydrologic function	A. Managing Stream Health	1. Protect, restore, and rehabilitate natural watershed processes	Yes	P	
		2. Control excess erosion and manage sedimentation	Yes	P	
		3. Maintain or improve in-stream flow conditions	Yes	P	May need base flow data <i>in order for it to be measureable.</i>
	B. Encouraging Flood-smart Land use Planning	1. Improve floodplain connectivity	Yes	P	
		2. Preserve land perviousness and infiltration capacity	Yes	P	<i>Change "Preserve" to encourage because of limits in Land Use authority. Collaborate with other entities whose have control over landuse. Look at CCMP objectives on land use. Consider including in a "land use" goal category.</i>
	C. Funding	1. Secure funds to implement solutions	Yes	P	

IV. Contribute to the protection and improvement of the quality of water resources	A. Creating Effective Pollution Prevention for Both Surface and Groundwater	1. Minimize point and non-point source pollution	Yes	P	"Minimize" is a problematic word. Suggest "reduce" as this is measurable, assuming having baseline data. <i>Broad.</i>
		2. Reduce mass loading of pollutants to surface water	Yes	P	<i>Very Particular</i>
		3. Preserve natural stream buffers and flood plains to improve filtration of point and non-point source pollutants	Yes	P	General Comment: Much of this needs to be combined and reworded to reduce overlap and duplicity.
		4. Protect surface and groundwater resources from pollution and degradation	Yes	P	NPDES PERMITS, covered by IV.A.1-3; it seems like objectives 1-3 are actually strategies to attain this objective
		5. Anticipate emerging contaminants	NO	P	Procedural.; should be restated. <i>Needs drastic rewording. Is this an appropriate role for the IRWMP?</i>
		6. Eliminate non-stormwater pollutant discharges to storm drains	Yes	P	Combine with IV.A.1, but this is an action
		7. Reduce pollutants in runoff to the maximum extent practicable	Yes	P	Similar/same as IV.A.1.
		8. Continuously improve stormwater pollution prevention methods	NO	P	Needs rewording. Could include tracking low impact development methods?
	B. Exploring Innovative Water Quality Solutions	1. Reduce salinity-related problems	Yes	P	
		2. Minimize taste and odor problems	Yes	S	
	C. Managing the Overall Watershed Health with respect to Water Quality	1. Maintain health of whole watershed, upland vegetation and land cover to reduce runoff quantity and improve runoff quality	NO	P	Not measurable but concept is needed as an objective. A number of entities are working on measuring "watershed health", could look at Bay Institute scorecard, CCMP report card.
		2. Periodically evaluate beneficial uses	NO	P	Could be measured if determining whether or not beneficial uses are being met. <i>Combine with I.D.1.</i>
	D. Funding	1. Secure funds to implement solutions	Yes	P	
V. Contribute to the protection of public health, safety, and property	A. Improving Water Quality and Exploring Innovative Solutions with respect to Health & Safety	1. Provide clean, safe, reliable drinking water	Yes	P	
		2. Minimize variability for treatment	Yes	S?	Clarify -- variability within a facility, among facilities? Types of treatment or results?
		3. Advance technology through feasibility studies/demonstrations	Yes	S	
		4. Meeting promulgated and expected drinking water quality standards	Yes	P	Overlaps with V.A.1..
		5. Minimize health impacts associated with polluted waterways	NO	P	Need to rewrite.
	B. Improving Infrastructure with respect to Health, Safety, and Property	1. Manage floodplains to reduce flood damage to homes, businesses, schools, and transportation	Yes	P	Delete "Manage floodplains to," so it reads "Reduce flood damage....."

		2. Achieve effective floodplain management by encouraging wise use and management of flood-prone areas	NO	<i>P</i>	Same as managed floodplains. <i>Reword - is it a guiding principle. Land use planning issue.</i>
		3. Maintain performance of flood protection and stormwater facilities	Yes	<i>P</i>	
		4. Partner with municipalities to prepare mitigation action plans that reduce flood risks to the community	Yes	<i>P</i>	<i>Land use planning issue.</i>
	C. Funding and Mutual Aid	1. Coordinate resources and mutual aid between agencies to enhance agency effectiveness	Yes	<i>P</i>	
		2. Secure funds to implement solutions	Yes	<i>P</i>	
	0 A. Creating Effective, Environmentally-friendly, Construction Practices	1. Provide net benefits to environment	NO	<i>P</i>	Too vague. General Comment: Should we move the "environmental" objectives from the first Goal and put those objectives in with this last Goal?
		2. Protect wildlife movement/wildlife corridors	Yes	<i>P</i>	
		3. Improve structural complexity (riparian and channel)	Yes	<i>P</i>	General Comment: Much of this category needs to be combined and reworded to reduce overlap and duplicity.
		4. Design and construct natural flood protection and stormwater facilities	Yes	<i>P</i>	
	B. Improving habitat through protection, restoration, and recovery (Maybe this should be the objective and the other items would be the things we measure it by)	1. Conserve and restore habitat for species protection	Yes	<i>P</i>	General Comment: Much of this category needs to be combined and reworded to reduce overlap and duplicity.
		2. Acquire, protect and/or restore wetlands, streams, and riparian areas	Yes	<i>P</i>	
		3. Enhance wildlife populations and biodiversity (species richness)	Yes	<i>P?</i>	Too vague. But can be measured? <i>May not be applicable to all IRWMP projects.</i>
		4. Provide lifecycle support (shelter, reproduction, feeding)	No	<i>P</i>	<i>Hard to measure. May not be applicable to all IRWMP projects.</i>
		5. Protect and recover fisheries (natural habitat and harvesting)	Yes	<i>P</i>	
		6. Manage pests and invasive species	Yes	<i>P</i>	
		7. Recover at-risk native and special status species	Yes	<i>P</i>	
	C. Funding	Secure funds to implement solutions	Yes	<i>P</i>	