# Inyo-Mono IRWM Plan Update to 2016 Plan Standards

## What needs to happen

* 2016 IRWM Prop. 1 Guidelines require updates to 9 Plan Standards (all of which are individual chapters in the Inyo-Mono IRWM Plan)
* There is additional information to incorporate into the Inyo-Mono IRWM Plan from the Prop. 84 Round 2 Planning Grant. Content has already been developed by Program Office.
* RWMG must adopt revised/updated Plan and then submit for approval by DWR through the Plan Review Process

## Timing

* To be eligible for Round 1 Implementation funding, IRWM Plans need to be updated per climate change and water quality regulations by grant award date (which is not likely to be earlier than end of 2018), but not to full 2016 Guidelines. Needs to be through DWR Plan Review Process too.
	+ *However, Program Office recommends that we do all updates at once so that we only have to submit Plan for Plan Review Process once.*
* Current info on Implementation: Round 1 draft PSP in Spring 2018, applications due Fall 2018.
	+ Concept PSP in December 2017, with time for comments from Roundtable of Regions before release of Draft PSP.
	+ DWR will issue ‘FAQs’ for issues such as Plan updates to maintain consistency
* From Guidelines:
	+ To ensure that IRWM Plan reviews can be completed in time, DWR will set a Plan submittal deadline of 60 calendar days prior to the application due date for the Proposition 1 Implementation grant solicitation.

## Program Office proposal

* Plan updates to be completed by Rick Kattelmann and Holly Alpert, along with formatting and submitting to DWR for Plan Review Process
* Rick @ 100 hours x $50.00/hr = $5,000
* Holly @ 100 hours x $50.00/hr = $5,000
	+ Total of $10,000
* Assuming Round 1 Implementation applications are due ~Oct. 1, 2018:
	+ June 30, 2018: Program Office releases updated Plan to RWMG to review
		- May be able to release parts/sections earlier
	+ Late July 2018: RWMG adopts updated Plan
	+ August 1, 2018: Program Office submits IRWM Plan to DWR for Plan Review Process
		- We will receive feedback, have an opportunity to respond, and then DWR makes the Plan and its review available for public comment for 30 days
	+ Aiming to have Plan approved by DWR around October 1, 2018
	+ There’s likely to be some flexibility in this timing as long as we’re showing good-faith effort to complete the Plan update
* Dates may also be flexible based on the timing of Round 1 Implementation process (dates above should represent the fastest timeline necessary)

## Other Information

### Stormwater Resources Plans

Below is information provided by DWR regarding the inclusion of Stormwater Resources Plans (SRP) into IRWM Plans through the Plan Update process. Program Office posed two questions to DWR in September 2017 and received the following answers:

1. Are we required to have the entirety of the region covered in an SRP?

Entire SRP coverage of an IRWM Region is not required; the watershed(s) incorporated by one or more SRPs may cover all or portions of an IRWM region. Grant funding for stormwater projects could occur within these SRP watershed planning areas.

1. What are the consequences, with respect to the Plan Review Process, if we don't have a completed SRP?

There are no consequences with respect to the IRWM Plan Review Process of not having a developed SRP other than, as you stated, the RWMG being unable to apply for stormwater project funding under the IRWMP. Other project types would not be affected and could receive implementation IRWM grant funding. SRPs developed by agencies in the Inyo-Mono IRWM region should be incorporated into the IRWM Plan.

The 2016 IRWM Guidelines do not require a *specific* method for incorporating a SRP into the IRWM plan. Pursuant to the Local Water Planning IRWM plan standard the IRWM Plan “should discuss the processes that it will use to incorporate such plans”. However, for general guidance “incorporation” of a SRP into an IRWM plan means that the SRP is integrated into the IRWM plan itself in a logical, internally consistent manner; OR is a standalone document (e.g. an appendix) referred to in the IRWM plan. In either case it must be apparent in reviewing the IRWM plan that the required SB 985 compliant SRP(s) is/are included. In the event that a SRP is still under development after the IRWM plan has been adopted then the plan should discuss the process it will use to incorporate the plan into the IRWM plan and where it will be referred to or incorporated in the IRWM plan. For a SRP to be consistent with the 2016 Guidelines it must 1) include documentation that the State Water Resources Control Board has reviewed it and found it in compliance with SB 985. DWR does not have regulatory purview to review a SWRP for consistency with SB 985; and 2) be incorporated into the IRWM Plan.