October 26, 2018

Subject: Summary of the Upper Sacramento Regional Watershed Action Group’s (RWAG) 2018 Draft Update to the Integrated Regional Water Management Plan.

To whom it may concern:

The 2018 Draft Updated Upper Sacramento (USR) Integrated Regional Water Management Plan (IRWMP) was made available for public review on Oct. 2, 2018, with a deadline of Nov. 2, 2018, for return of comments.

As part of the 2018 Plan update the document was edited for general readability, to make it more current where feasible, and to reflect new requirements for IRWM plans as detailed in the 2016 California Department of Water Resources (DWR) IRWMP Grant Program Guidelines. Substantive changes were identified in the draft update using pale green highlighting. The draft document also contains numerous inconsequential edits that were not highlighted, such as updating the acronym of our name from RWMG to RWAG.

Reviewers have asked for a summary of proposed changes to the original 2013 plan. A brief summary of substantive revisions to each chapter is provided below.

Chapter 1 (Introduction) was revised to identify how the USR Plan addresses current statewide priorities. California’s 2016 priorities emphasize conservation, regional self-reliance, drought preparedness, important ecosystems restoration, expansion of water storage and use-efficiency, co-equal goals for the Delta, improved groundwater management, provision of safe drinking water, increased flood protection, and increased operational and regulatory efficiency.

Chapter 2 (Planning Framework) was revised to (1) discuss tribal participation and the “government-to-government relationship” that is to be followed when coordinating with tribes; (2) discuss recent efforts to engage stakeholders in the IRWM planning process; and (3) describe technical assistance available to very-low-income source water communities through DWR’s Disadvantaged Community Involvement (DACI) program.

Chapter 3 (Region Description) was updated to include information on potential water quality contamination from nitrate, arsenic, perchlorate, or hexavalent chromium.

Chapter 4 (Water Use Planning) was revised to (1) introduce the Sustainable Groundwater Management Act (SGMA) of 2014; (2) discuss the City of Mt. Shasta’s effort to update their General Plan through the lens of climate resilience; and (3) discuss storm water resource plans.

Chapter 5 (Land Use Planning) was updated to (1) briefly discuss past and possible future participation by specific stakeholders; (2) include information on storm water resource plans; and (3) discuss opportunities in the region to address climate change; primarily through resilient forest practices such as hazardous fuels reduction and increasing use of prescribed fire.

Chapter 6 (Issues and Interests) was revised to incorporate climate change considerations identified in Ch. 9. A statement also was added to reflect the focus of the 2016 DWR guidelines regarding coordination with tribes on a government-to-government basis.

Chapter 7 (Objectives) was updated to (1) discuss changes in the IRWMP Grant Program Guidelines; (2) ensure the USR’s objectives are consistent with current climate change projections; and (3) revise target completion dates for objectives that have not yet been met.

Chapter 8 (Resource Management Strategies) was revised to ensure updated climate change information is adequately reflected in the USR’s resource management strategies (RMS) and to incorporate three new RMS included in the 2013 California Water Plan: Sediment Management, Water and Culture, and Outreach and Engagement.
Chapter 9 (Climate Change) was the only chapter that was fully rewritten and reorganized so as to include climate change research and projections not addressed in the 2013 IRWM Plan.

Chapter 10 (Project Review Process and Implementation) was updated to (1) include additional priorities consistent with DWR’s IRWMP Grant Program Guidelines; (2) make the chapter consistent with climate change projections identified in Ch. 9; and (3) include the three new RMS discussed in Ch. 8.

Chapter 11 (Impacts and Benefits) – There were no substantive changes made to Chapter 11.

Chapter 12 (Plan Performance and Monitoring) was revised to (1) set new dates for objectives that have not yet been met; (2) discuss challenges and potential solutions to tracking project performance, and incorporating lessons learned in the USR; and (3) discuss adaptive management in response to uncertainty and rising temperatures.

Chapter 13 (Data Management) was updated to state that the USR now has projects featured on a web-based data management tool accessible at the Upper Sac IRWM website. It also highlights that new administrative staff can assist with data management to make existing data more relevant to the RWAG process, as well as address data gaps that could benefit RWAG’s purpose.

Chapter 14 (Technical Analysis) was revised to summarize the information used during development of Ch. 9.

Chapter 15 (Finance) – There were no substantive changes made to Chapter 15.

Chapter 16 (Governance) was updated to clarify the decision-making process and governance structure since adoption of the 2013 IRWM Plan, ensuring alignment between the RWAG’s Interim Bylaws and the 2013 Memorandum of Agreement. The Update recognizes that administrative duties previously covered by volunteers are now assigned to paid administrative staff for the duration of the DACI phase, or as long as funds are available and necessary to ensure effective administration of RWAG operations. It also proposes more coordination with the Upper Pit and North Coast regions on a variety of interconnected climate-related forest and water issues.

Appendix F (Climate Change Vulnerability Assessment) was updated as necessary to ensure that it is at least “equivalent” to the assessment contained in the Climate Change Handbook for Regional Water Planning. This task largely entailed adding a few checklist items for topics that do not necessarily pertain to the USR, as well as making minor edits so that the text of the assessment is consistent with Ch. 9.