

**PROPOSED MODIFICATIONS TO DRAFT IRWM PLAN**  
(Excludes revisions to projects, project rankings, and appendices)

**LEGEND:** ASH is Meleah Ashford, Ashford Engineering  
 CK is Coastkeeper (Unidentified reviewer)  
 HAZ is Lisa Hazard  
 JMEG is Megan Johnson, Southern California Wetlands Recovery Project  
 KIM is Ed Kimura, Sierra Club  
 NYG is Diane Nygaard  
 PANG is Ulysses Panganiban (City of San Diego/Storm Water Pollution Prevention Division)  
 PASEK is Jeff Pasek, City of San Diego  
 TUCK is Shelby Tucker, SANDAG  
 VARTY is Sue Varty, Olivenhain MWD  
 VERR is Dennis Verrilli, County of San Diego DGS  
 WAT is Richard Watson, Richard Watson & Associates  
 WEST is Meena Westford and Greg Krzys, US Bureau of Reclamation

REF #	COMMENT NO.	PAGE	PARAGRAPH	SECTION, FIGURE, or TABLE	COMMENT	PROPOSED REVISION TO DRAFT IRWM PLAN
<b>SECTION A COMMENTS</b>						
1	ASH-19	A-3	2		Is the reference to Chapter G (Implementation) correct or should it be Chapter M?	The reference to Section G is correct. Paragraph 2 of page A-3 will be modified to add the language "short-term priorities" after the words "will be required to".
2	ASH-20	A-4			This section should discuss and reference the MOU between the RWMG.	Section A.1 will be modified to reference the MOU.
3	TUCK-2	A-6		The City of San Diego is Region's	Missing "the"	The recommended correction will be made to Section A.2.
4	TUCK-4	A-7		Programs that provide opportunities to pursue integration...	Integrated?	The recommended correction will be made to Section A.2.
5	PANG-2	A-8	2	A-2	Revise first sentence to "The City of San Diego's Storm Water Pollution Prevention Division (Storm Water Division) is within the City's General Services Department."	Text on page A-8 will be revised as suggested.
6	PANG-3	A-8	2, 3	A-2	Replace all occurrences of "Storm Water Program" with "Storm Water Division."	The change will be made as suggested.
7	PANG-4	A-8	2	A-8	Add "Area of Special Biological Significance (ASBS) implementation" right after "Total Maximum Daily Load (TMDL) implementation."	Text on page A-8 will be revised as suggested.
8	ASH-21	A-11		Table A-2	<b>Jurisdictional Issues:</b> I think that this section should also recognize conflicts and resolution of issues between NGO's or environmental organizations and jurisdictions. The IRWM and RAC has done a great job of setting an example of bringing these two groups together. Currently there is fragmentation within organizations and between organizations that the IRWM process can resolve for greater efficiency in program implementation.	Text within Section A.3 will be revised to note the need to recognize and resolve conflicts between agencies and NGOs/environmental organizations.
9	JMEG-1	A-14			I disagree that disadvantaged communities were represented on the RAC. Coastkeeper represents the Bay Council, which deals with issues of EJ, but they aren't actually representatives of a disadvantaged community. I have mentioned this in the past and provided names of people to contact who would better represent these communities and issues. Please contact me to discuss.	The text on page A-14 will be changed to note that disadvantaged communities are included within jurisdictions of several RAC agencies, and disadvantaged community needs are addressed by several non-government organizations within the RAC. It should be noted that the Draft IRWM Plan proposes additional disadvantage community outreach as part of Short Term Priority #3 (see Table G-6 on page G-17).
<b>SECTION B COMMENTS</b>						
10	ASH-1	B-2	1		Define EBEB in text.	Text on page B-2 will be modified as suggested.
11	ASH-2	B-2	2		MS4 = municipal separate storm sewer system (check Acronym List as well)	Text on page B-2 will be modified as suggested.
12	ASH-3	B-2	3		Specify that you are discussing <u>Region 9</u> of the RWQCB, and add the work "also" includes the southern portions...	Text on page B-2 will be modified as suggested.
13	PANG-5	B-2	N/A	Boxed text	Per the Regional Board, the Peñasquitos Hydrologic Unit is divided into two Watershed Management Areas (WMAs): the Los Peñasquitos WMA and the Mission Bay WMA.	The text box will be revised to note this fact.
14	WAT-1	B-2	2	Section B	Since stormwater is also regulated through the general industrial and construction permits, it might be more appropriate to say that "municipal stormwater runoff within the entire Region..." rather than just "stormwater runoff within the entire Region."	Text on page B-2 will be modified as suggested.
15	VARTY-4	B-3	2		Wastewater Service: I was not aware that the entire county was regionalized. I think this may be true for large portions of the county, but not all.	The text on page B-3 will be modified to note that large portions of the County are served by regional wastewater systems.
16	TUCK-5	B-4		Regional Overview	Reference to table B-1 should be from 2006 updated 2030 forecast	The recommended correction will be made to Section B.1.
17	TUCK-6	B-5		Table B-1	Need new forecast numbers from 2006	A footnote will be added to note that newer numbers are available from SANDAG and that existing plans referenced in the IRWM Plan are primarily developed based on the 2003 projections.
18	TUCK-7	B-6		Table B-2 and B-3	Need new forecast numbers from 2006	A footnote will be added to note that newer numbers are available from SANDAG.
19	TUCK-8	B-9		Table B-6 and text: SANDAG (2003) does not project...	Need new forecast numbers from 2006	A footnote will be added to note that newer numbers are available from SANDAG.

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20	TUCK-9	B-10		Table B-6	Need new forecast numbers from 2006	A footnote will be added to note that newer numbers are available from SANDAG.
21	ASH-4	B-11	4		A long-term historical look at rainfall in SD is helpful and will clearly show 30-year trends. We are currently in the depths of a drought period.	Text will be added to page B-11 to note that the region is currently in a drought.
22	KIM-1	B-14			Global Climate Change Issues. Energy demand should be added as an issue. Energy demands are expected to increase and need to be offset by energy conservation and efficiency measures. Because water is the largest energy user in California, the Plan must address this issue.	The text on page B-14 will be modified to reflect the comment.
23	PANG-6	B-15	N/A	B-9	Per the Regional Board, the Peñasquitos Hydrologic Unit is divided into two Watershed Management Areas (WMAs): the Los Peñasquitos WMA and the Mission Bay WMA.	A footnote will be added to Table B-9 to note this fact.
24	TUCK-10	B-16		(last paragraph) Santa Margarita River Watershed represent <b>an</b> most important	"an" should be "a"	The recommended correction will be made to Section B.3.
25	TUCK-11	B-17		Ground and surface <b>and</b> waters	Extra "and"	The recommended correction will be made to Section B.3.
26	ASH-5	B-18	2		There re too many "Carlsbad HU"s in the paragraph.	Text on page B-18 will be modified as suggested.
27	ASH-6	B-18	2		Discuss reservoirs in Carlsbad HU - Olivenhain, others?	Text will be modified to note that Dixon, Wohlford, and Olivenhain Reservoirs are within the Carlsbad HU.
28	ASH-7	B-18	3		Add "Five of the regions 10 lagoons are in the Carlsbad HU" and note that they are the subject of a current TMDL development process for bacteria, sediment, nutrients, and TDS.	Text on page B-18 will be modified as suggested.
29	TUCK-12	B-23		Final sentence...While State and local governments do not...	An example that could be used is the relationship developed between the County and the Tribes as well as SANDAG and the Tribes. A representative is now sitting on SANDAG Committees. Please let me know if you would like more information.	The SANDAG example will be cited as suggested in Section B.4.
30	VARTY-5	B-24	1		Water Supply Agencies: Also should be included in this paragraph: CIRC (Cooperative Interagency Resources Coalition) is a website sponsored by the Water Authority. The site provides a forum for sharing information and resources among member agencies.	Page B-24 provides a general description of water agencies and systems within the Region, and mention of a regional website is out-of-place on this page. Mention of CIRC will be added within Section J.2 (existing monitoring) as an information source.
31	ASH-8	B-27	1		In addition, all copermittees are required to implement stormwater programs on a watershed basis following the boundaries of the WMAs.	Text on page B-27 will be modified as suggested.
32	ASH-9	B-27	4		Buena Vista Lagoon Foundation	Text on page B-27 will be modified as suggested.
33	ASH-10	B-28	1		Why not list other NGOs - Coastkeeper, Preserve Calaveras, Friends of Agua Hedionda Creek, etc.	Text on page B-28 will be modified as suggested.
34	ASH-11	B-28	5		Remove the word "heavy"	Text on page B-28 will be modified as suggested.
35	JMEG-2	B-28			Add: Groundwork San Diego- Chollas Creek and the SCWRP San Diego Task Force	Text on page B-28 will be modified as suggested.
36	JMEG-3	B-33			Agua Hedionda Creek/Lagoon also in CHU	Text on page B-33 will be modified as suggested.
37	ASH-12	B-36	2		Region 9 has initiated TMDL studies for 10 local lagoons. It is under Order 2006-076 and includes bacteria, sediment, nutrients, and TDS.	Text on page B-29 will be modified as suggested.
38	KIM-2	B-38			Final TMDL bacteria for beaches and creeks has been prepared (June 25, 2007) and awaits adoption.	The text on page B-38 will be modified to reflect the comment.
39	ASH-14	B-40	1		change "closure" to "advisory" - Talk to Sheri McPherson about the distinction.	Text on page B-40 will be modified as suggested.
40	TUCK-13	B-40		Bacteria resulted beach closures	Missing "in"	The recommended correction will be made in Section B.5.
41	ASH-15	B-41		T B-12	Bacteria exceedance do not "close" a beach, they "post " a beach. Closures are only for sewage.	Text on page B-41 will be modified as suggested.
42	TUCK-14	B-42		Toxic Organic Compounds	First sentence, "inorganic" should be "organic"	The recommended correction will be made in Section B.5.
43	TUCK-15	B-44		Figure B-14	Where is this figure? Or, is it a table?	Collation error: Figure B-14 should have been located after page B-44.
44	TUCK-16	B-47		Toxic Organics Compound	Put TOC in parenthesis after heading b/c used later	The recommended correction will be made in Section B.6.
45	NYG-23	B-49			There are also vernal pools in the CHU- Poinsettia in Carlsbad plus others	Carlsbad HU will be added to the list of HUs with vernal pools.
46	TUCK-17	B-49		Figure B-15	Figure missing	Collation error: Figure B-15 should have been located after page B-50.
47	JMEG-5	B-51			Estuarine habitats include coastal lagoons, seagrass beds, southern coastal salt marsh, and brackish marsh. Submerged habitats also include seagrass beds.	Text on page B-51 will be modified as suggested.
48	KIM-3	B-51			Description of the Region, Aquatic, Estuarine, and Marine Habitat. The Plan should include (1) the results of the SDRWQCB biological assessment monitoring program for fresh water streams: <a href="http://www.waterboards.ca.gov/sandiego/programs/bioassessment.html">http://www.waterboards.ca.gov/sandiego/programs/bioassessment.html</a> and <a href="http://www.waterboards.ca.gov/sandiego/programs/bioassess/Biological%20Assessment%20and%20Biocriteria.pdf">http://www.waterboards.ca.gov/sandiego/programs/bioassess/Biological%20Assessment%20and%20Biocriteria.pdf</a> . The results show poor habitats using the metric Index of Biological Integrity (IBI). Add a table listing the water body and its IBI. (2) San Diego Bay Advisory Copermmittee for Ecological Assessment Report: <a href="http://www.porofsandiego.org/sandiego_environment/documents/SB68/SB_68_Final_Report_2-24-6.pdf">http://www.porofsandiego.org/sandiego_environment/documents/SB68/SB_68_Final_Report_2-24-6.pdf</a>	The general characterization of the Region's habitat will be modified to note the referenced studies. It should be noted that the objective of the text on page B-51 is to provide a general description of environmental resources. While it would be possible to enumerate a number of issues and list IBI data for a number of water bodies in the Region, the general description within the Draft IRWM Plan appears adequate to meet the IRWM Plan guidelines for describing the Region. It should also be noted that significant variation in IBI values have been reported during the past 10 years, and differences in opinion exists as to what the data signify.
49	JMEG-6	B-52			Eradication of Caulerpa taxifolia has been declared official.	Text on page B-52 will be modified as suggested.

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50	KIM-4	B-52			Invasive Species Add exotic species in San Diego Harbor listed in the report: <a href="http://www.dfg.ca.gov/ospr/organizational/scientific/exotic/OSPR%20Report%20again.pdf">http://www.dfg.ca.gov/ospr/organizational/scientific/exotic/OSPR%20Report%20again.pdf</a>	The referenced studies will be noted, but the objective of the text on page B-52 is to provide a general description of environmental resources. While it would be possible to enumerate a number of issues and invasive species associated with each water body within the Region, the general description within the Draft IRWM Plan appears adequate to meet the IRWM Plan guidelines for describing the Region.
51	NYG-26	B-52	invasive species		Should also acknowledge the major eradication program in the CHU- and its current status.	Text will be modified to note that eradication programs are ongoing within the Region.
52	TUCK-18	B-52		Invasive species impacting...	The word "includes" should be singular?	The recommended correction will be made in Section B.7.
53	TUCK-19	B-54, 55		Figure B-16, 17	These figures are referenced but not present	Collation error: Figures B-16 should have been located after page B-54.
54	TUCK-20	B-57		Figure B-17	References Figure B-17 (missing)	Collation error: Figure B-17 should have been located after page B-56.
55	VARTY-6	B-60	B-18		Regional Wastewater/Recycled Water Facilities: OMWD's 4-S Reclamation Facility is not on this map.	Figure B-18 will be modified as suggested.
56	TUCK-21	B-61		Figure B-18	References Figure B-18 (missing)	Collation error: Figure B-18 should have been located after page B-62.
57	KIM-5	B-63			The statement that local agencies use regional outfalls to discharge unused recycled water is not correct at least for the City of San Diego's two water reclamation plants, the North City and South Bay. Each are capable of treating wastewater to secondary and tertiary levels. Tertiary treatment is used only to supply the contracted recycled water demand and the remaining wastewater flow is treated to secondary and discharged into their respective outfalls; the South Bay and Pt. Loma outfall. Therefore, these reclamation plants do not discharge unused recycled water into their outfalls. The City of San Diego Water Reuse Study recognized the seasonal demand of non-potable recycled water and recommended that to make optimum use of the recycling capacity of these plants, they should provide both non-potable and indirect potable recycled water. The report is available on line at: <a href="http://www.sandiego.gov/water/waterreustudy/involvement/fd2006.shtml">http://www.sandiego.gov/water/waterreustudy/involvement/fd2006.shtml</a>	Text on page B-63 is correct as stated, but to avoid misinterpretation or confusion, the text will be revised to state: "Local agencies may utilize either storage facilities or regional ocean outfall facilities to handle excess recycled water or wastewater flows during periods of inclement weather or limited demand."
58	TUCK-22	B-66		...the new SANDAG 2030 population forecast	Not new because 2006 is the new. CWA used the current forecast at the time but should not be referenced as new since another forecast has come out since the preparation of the 2005 URWMP.	The label "new" will be omitted, the use of the 2003 forecast will be cited, and the availability of the newer 2006 forecast will be noted.
59	TUCK-23	B-71		...also recovery poor quality	"recover" not "recovery"	The recommended correction will be made to Section B.10.
60	TUCK-24	B-71		Groundwater represents the exclusive	Needs paragraph indentation	The recommended correction will be made to Section B.10.
<b>SECTION C COMMENTS</b>						
61	PANG-17	C-i	N/A	TOC	Revise "Object H - Restore, restore, and maintain habitat and open space" to "Objective H - Protect, restore, and maintain habitat and open space."	The TOC title for Objective H will be revised as suggested.
62	TUCK-25	C-1		Section C. Summary- Through an public...	"a" not "an"	The recommended correction will be made in the section summary.
63	TUCK-26	C-2		Through a stakeholder-driven process and adaptive process...	Condense? (a stakeholder-driven and adaptive process)	The word "process" will be deleted as suggested on page C-2.
64	TUCK-27	C-3		Stakeholders input	Singular, plural or possessive?	Text on page C-3 will be modified to "stakeholder input".
65	WEST-4	C-3			Objective A addresses stakeholder involvement and stewardship and meets the requirements of Goal 4 on the preceding page (C-2). Stewardship is also a primary component of Goal 3. Reclamation recommends that the first paragraph under Objective A be changed to reflect that Objective A meets requirements for both Goal 3 and 4.	Section C of the Plan will be modified as suggested.
66	NYG-2	C-6	Obj 4		It states the focus is Goal 4, but it should also be Goal # 3. A key concern is that the NCCP's do not really address water issues, and prior water quality programs did not look at land. This integrated water management plan, to be successful, needs to really integrate both.	The text under Objective 4 will be modified to reflect the comment.
67	TUCK-28	C-6		...relations between water quality	Should be "relationships"?	The recommended correction will be made on page C-6.
68	NYG-3	C-7	Rationale		Need to add to the bullet list something like: improve coordination of habitat conservation and water quality programs/regulations/permits.	The text will be modified to incorporate the suggested information.
69	TUCK-29	C-7		...considerable cost benefits of cost sharing	Clarify? I was confused by this sentence.	Text on page C-7 will be revised to state "agencies may recognize benefits of cost sharing, economies of scale, and ..."

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70	NYG-4	C-8		Table C-3	Need some better interim measures that don't require waiting until 2015 to see if there is any impact. Could identify 2-3 key areas for research and put completion date of those studies as the target.	Interim measures and proposed completion dates will be identified and included in Table C-3 to assess progress toward achieving the objective.
71	TUCK-30	C-8		Objective D, first section before comma	Awkward wording	Text on page C-8 will be modified to delete the word "Plan" and insert the phrase "Plan, local water plans, and the County's General Plan 2020, ..."
72	TUCK-31	C-8		(more than \$160 gross regional product)	Footnote?	The \$160 million value will be referenced back to Table B-7 on page B-11.
73	TUCK-32	C-8		...imported supply proposed by Metropolitan.	Awkward wording	Text on page C-8 will be modified to state: "... Metropolitan, and Metropolitan ordered a 50 percent cutback of the imported supplies."
74	TUCK-33	C-12		Projected to be comprises of approximately	Should be "comprised"	The recommended correction will be made on page C-12.
75	TUCK-34	C-12		...with the many of the Region's	Remove first "the"	The recommended correction will be made on page C-12.
76	JMEG-8	C-15		Objective H	Add: restore habitats that promote healthy water quality and protect sensitive habitats.	No change is planned to the wording of Objective H, but text within the Objective H section will be revised to incorporate the comment.
77	NYG-12	C-16	# 1-5	Table C-8	The values are all based on local plans- many of which do not yet exist. The state has established low and moderate income housing targets for each region, that then get translated by SANDAG into a city target. Key conservation targets should be developed the same way- give each city a target- let them come up with a plan to meet it. And since these targets need to address water as well as land impacts- they need to be higher than the minimums's included in the approved NCCCP's. The targets cannot be based on approved plans-unless there is a mandate for such plans- and for the plans to include targets for each of the measures. (The only local plan approved in north county does not have targets defined this way so there would be no way to even determine if this has been met.)	The comment is noted. The IRWM Plan is intended to be an umbrella document that includes water-related aspects of local water supply, habitat protection, flood protection, conservation, water quality protection, and other plans. Numerical values for the Table C-8 targets had not been assessed by the RWMG and RAC at the time of the Draft IRWM Plan, and values were left blank with notation that the targets would be selected to be "consistent with local plans". The RWMG and RAC will develop and insert numerical targets within the revised IRWM Plan that will help promote attainment of Objective H. The targets may represent interim or minimum values that are consistent with known local or sub-regional plans (e.g. County of San Diego plans). It is recognized that it will be necessary to revisit these targets in future iterations of the IRWM Plan to reflect improved information or more specific targets established in the plans of other local agencies or organizations.
78	TUCK-35	C-16		Bullet at top of page...developing, implementing, and maintaining...	Exchange "aquatic" with "wetland"	The recommended correction will be made on page C-16.
79	TUCK-36	C-16		Table C-8	What are the numbers and how will they be determined? There may not be numbers in local plans.	The comment is noted. Targets will be developed consistent with local plans, public input, and Regional needs.
80	WEST-6	C-18		C-10	Similar to comment 3 above, the cell beneath Goal 3 and across from Objective A should be a black circle.	Section C of the Plan will be modified as suggested.
81	WAT-3	C-19	NA	Table C-11	Three bullet points in the listing of challenges to achieving objective C should be revised to present a more accurate description of the challenges. The description of Basin Plan use designations in bullet 15 should be modified by substituting "past, present, and probable future uses" for "actual use" in order to be consistent with California Water Code Section 13241. Bullet 17 should be revised to include the concept of feasibility. Bullet 19 should be corrected to recognize that the State Water Board adopted a listing/delisting policy after much public input, reviewed the policy briefly after adoption of the 2004/2006 303(d) list, and agreed to a further review after completion of the 2008 303(d) list. In addition, a bullet could be added to indicate that the Basin Plan should clearly consider which water quality conditions could reasonably be achieved consistent with California Water Code Section 13241.	Bullets #15 and #17 will be modified as requested regarding beneficial uses. Bullet #19 will be modified to recognize that ongoing consideration of applicability of 303(d) listings is required.
<b>SECTION D COMMENTS</b>						
82	TUCK-37	D-2		Table D-1 present water management	Should be "presents"	The recommended correction will be made.
83	KIM-10	D-8			Agricultural Land Stewardship. The RWQCB should be included in the list of agencies to assist and aid in agricultural land stewardship. Water Quality provisions for wastewater discharges from agricultural activities are conditionally waived by the RWQCB Basin Plan. The conditional waivers include requirements that the discharger must comply with in order to qualify for the waiver. The Board has released for public comment a new set of conditional waivers for 11 classes of discharge operations to amend the Basin Plan. There are three classes of agricultural discharges: from animal operations, from agricultural and nursery operations and from silvicultural operations. The intent is to improve the water quality of the conditionally waived discharges. The Board plans to use a phased approach to implement the agricultural conditional waivers, in part due to the fact that small farms comprise the majority of agricultural operations many of which are unfamiliar with the water quality requirements. The first phase will focus on an educational outreach with the final objective to enroll all agricultural activities	The text on page D-8 will be modified to reflect Regional Board regulation of agricultural operations.

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84	JMEG-10	D-11			Within #9: What is "land-forming?". Add the word "restoration after "wetlands conservation and creation..." Instead of "improving flow hydraulics", we want to "restore and protect natural hydrology". The Army Corps believed that they were "improving" flow by channelizing our streams and rivers. Why was San Dieguito emphasized?	Text on page D-11 will be modified to address the comment.
85	JMEG-11	D-11			Within #10: Natural floodplain management must be a major component of floodplain management. See the Ventura IRWMP for good language. I'm not sure if any flood control districts do this within the County, but non-profits and local governments improve floodplain management when they preserve and restore natural habitats and open space within the floodplain.	Text on page D-11 will be modified to note that natural floodplain management is a means of flood protection.
86	TUCK-38	D-11		...facilities with Regional	Should be "the region"	The recommended correction will be made.
87	TUCK-39	D-16		(last paragraph) ...strategies that known to...	Missing "are"	The recommended correction will be made.
88	PASEK-1	D-18		Table D-5 Section E.2	There seems to be discrepancy between Table D-5 [Objectives Supported by Water Mgt Strategies] and Section E.2 [ Water Mgt Strategies Directly Addressing Objectives]. Is there a difference between these two things? Assuming D-5 and E.2 are getting at the same thing, then it seems the solid dots in D-5 [defined in footnote as "Water Mgt Strategy primarily and directly supports attainment of the Objective"] should equal the primary water mgt strategies listed for each objective in the text in E.2. But, they don't match up, at least for Objectives D, G, H, and I. We've edited Table D-5 to match section E.2. We have submitted this as a separate document.	Table D-5 of the IRWM Plan will be modified as suggested.
89	TUCK-40	D-19		Table D-6 identify...	Should be "identifies"	The recommended correction will be made.
90	TUCK-41	D-19		(3)...water resources management plan	Resource?	The recommended correction will be made.
91	CIN-14	D-20		Table D-6	"Smart Growth" is a real misnomer and all references to SANDAG's term should be deleted and replaced with something more descriptive....Like placing development next to underutilized transportation corridors. There is no such thing as Smart Growth. Take for instance the two sites SANDAG has identified in my city, The Buena Vista Valley and Ponto, neither are served by train and both are in critical environmental areas where it is not wise to overdevelop. SMART Growth has become an acronym for extra density - and should be deleted from the IRWMP.	A reference or explanation to the term "smart growth" will be added to Table D-6.
92	CIN-17	D-20		Table D-6	Delete Smart Growth and conceptualize what it is you are trying to say here. As previously stated the term "smart Growth" is a vague SANDAG misnomer.	A reference or explanation to the term "smart growth" will be added to Table D-6.
93	TUCK-42	D-25		D.5	Are the terms hydrographic and hydrologic interchangeable?	Yes, but the IRWM Plan text will be revised to use the term hydrologic.
<b>SECTION E COMMENTS</b>						
94	TUCK-43	E-2		IRWN planning will conducted within	Missing "be"	The recommended correction will be made.
95	JMEG-14	E-5		Objective F	Protecting wetland habitat is part of natural floodplain management.	Protecting wetlands habitat will be added as a secondary strategy to Objective F (and in Table D-5).
96	TUCK-44	E-7		...recreation through enhance aesthetics	"enhance" should read "enhanced"	The recommended correction will be made.
97	TUCK-45	E-11		...integrate to enhance the reliability Region's water...	Missing "of the" or "of"	The recommended correction will be made.
98	TUCK-46	E-12		Increased coordination of project, improved system efficiency...	Should read "projects"	The recommended correction will be made.
99	TUCK-47	E-17		Table E-3 ...summarize additional benefit	Should be "summarizes"	The recommended correction will be made.
100	TUCK-48	E-17		(last paragraph) Within section G, actions plans are...	Should be "action"	The recommended correction will be made.
<b>SECTION F COMMENTS</b>						

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101	WEST-3	F-2			On page F-2, third paragraph, the discussion states "...project proponents will be encouraged to better integrate and combine projects and work together on related projects to maximize overall benefits and minimize project costs." Reclamation recommends that the overall discussion in Section F (e.g. pages F-8 through F-18) be expanded to include more detail on how the statement from page F-2 will be achieved. This should include how the RWMG, RAC, stakeholders and project applicants will work together to "integrate and combine" projects and what the factors are that will be considered for integrating projects. Some key factors to consider should be to combine projects within a watershed that will result in increased benefits, reduced duplication of efforts, overall project cost savings and meet more IRWMP strategies than the stand alone projects.	Page F-2 will be revised to note that, at this time, the RAC has decided to not force project proponents to combine projects, but to instead indirectly encourage integration and combination by publishing (within the IRWM Plan) means by which project funding evaluation and scoring and is to be accomplished. With this information, project proponents can coordinate project integration and combination so as to maximize benefits and attainment of Regional objectives, minimize costs, and maximize funding potential. As the Region's IRWM Plan institutional structure is developed, the participants can decide if and how Region-wide measures can be taken to better integrate and combine projects.
102	TUCK-49	F-6		Maintain public involvement section first sentence before comma	Awkward wording	Text on page F-6 will be modified to break the long sentence into two parts.
103	TUCK-50	F-9		(last paragraph) "This is the first time..."	Reference public workshops in past tense for final draft	The recommended correction will be made.
104	PANG-1	F-10	N/A	F-2	Table F-2 does not match the table in Appendix 10. On one hand, Table F-2 has "Green Street LID Porous Paving and Infiltration" as a Tier I project while the Appendix 10 table does not. On the other hand, the Appendix 10 table has "Green Lot Porous Paving and Infiltration, Phase 2" as a Tier I project while Table F-2 does not. Perhaps both tables should list "Green Street LID Porous Paving and Infiltration" as a Tier I project, and "Green Lot Porous Paving and Infiltration, Phase 2" as a Tier IA project.	The tables will be updated as suggested.
<b>SECTION G COMMENTS</b>						
105	ASH-22	G-1	2		The first sentence of Section G-1 doesn't make sense.	Text on page G-1 will be modified to insert the words "priorities and" after "short-term" in the first sentence of Section G.1.
106	TUCK-51	G-1		(first paragraph) Section G.1 first sentence	Something is missing	The sentence will be revised to state ".. Implement short-term priorities and begin the process..."
107	WEST-7	G-2			Section G should include a discussion or framework element to allow for the future coordination and integration (and membership) of regional partners in southern Orange County, southwest Riverside County and U.S.-Mexico cross border entities into the San Diego IRWMP.	Implementation of short-term priorities (see Sections F and G) include actions for increased coordination with Riverside and Orange County IRWM Plan efforts. These coordination efforts will continue on several levels including (1) direct contact and coordination between IRWM groups, (2) coordination on a watershed-level among watershed agencies, (3) coordination on a project-level among agencies cooperatively implementing projects, and (4) coordination efforts associated with pursuit of water planning activities and programs that involve USBR or other federal agencies. To ensure continued coordination, an action item will be added to Table G-10 (page G-24) for coordinating the update of the San Diego Region IRWM Plan with Orange County, southwest Riverside County, and the U.S. Mexico cross border entities.
108	NYG-36	G-3		Table G-9	The issue is really not just determining when the Plan needs to be revised- but there will be a need to revise the numerous water management plans that feed into this- and in some cases produce them where they don't exist. Integrated planning needs to go both directions- with the Plan resolving issues/setting priorities that should then result in changes to the component plans.	Text associated with Table G-9 will be modified to note that ongoing revision of local plans and the need to coordinate the IRWM Plan with modifications in these local plans.
109	TUCK-52	G-3		(first paragraph)"Proposition 50, Chapter..."	Do not need to reference again the three RWMG members and the MOU?	The recommended correction will be made.
110	ASH-23	G-4	1		I thought that we were working towards a watershed-type structure. This bulleted list makes it seem like we are not. I would prefer that language was added to actually open up the possibility that as watershed groups get more organized, a watershed approach could be used. This approach would be that watersheds identify the needs and are filtered up to the RAC and RWMG. I do not ever remember us (the RAC) agreeing that a watershed approach was not appropriate for a long-term structure. Maybe the wording just needs to be changed to make it more clear that for the short-term (i.e. this plan) a watershed structure was not appropriate, but that it is our goal for the long-term.	Page G-4 of the Plan will be revised to note that there are a number of challenges to organizing by watershed. As discussed later in Section G, the watershed-based approach could be developed and implemented at a later time if applicable parties think this approach is appropriate and workable.
111	NYG-32	G-4			Conservation advocacy groups need to be specifically included ( land trusts are just one part of that) Also the agencies responsible for habitat conservation were not included- state and federal wildlife agencies and they should be part of the stakeholders if there is to be real integration of land and water planning as is implied in the overall goals..	As described in Section G, it is anticipated that NGOs such as conservation advocacy groups will choose to be part of the development, formation, and implementation of a Regional IRWM institutional structure. The text on page G-4 will be modified to reinforce this point made throughout Section G.
112	TUCK-53	G-4		(last paragraph) "IRWM Plan, however..."	"the" should read "they"	The recommended correction will be made.

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113	TUCK-54	G-7		Examples of existing institutional structures	San Diego Association of Governments is not a JPA. SANDAG has many designations but the federal designation is that we are an MPO (Metropolitan Planning Organization). SANDAG was recently consolidated through state legislation that changed our status from a JPA to a state designation as a Regional Consolidated Agency. Please let me know if you need more information.	Text in Section G.2 will be modified to address the comment.
114	TUCK-55	G-9		(second paragraph) "CUWCC was..."	Remove "Memorandum of Understanding" because already identified short hand as MOU	The recommended correction will be made.
115	TUCK-56	G-16		"RAC meeting in 2007"	Since 2007 is almost over is this accurate? Will there be enough time to get into the institutional structure as the "focal point"?	The sentence will be revised to "RAC meetings in 2007 and 2008..."
116	TUCK-57	G-19		"Table G-6 presents..."	"actions" should read "action"	The recommended correction will be made.
117	TUCK-58	G-20		"...constitute an important the first step..."	Remove "the"	The recommended correction will be made.
118	WAT-4	G-21	2	Section G	The bullet points in paragraph two should be revised to be consistent with any changes made in response to my suggested changes to Table C-11 (item 3).	Bullets on page G-21 will be modified as suggested.
119	NYG-34	G-24		Table G-10	This would imply that the public has no role in reviewing the allocation of prop 50 funds. - which I believe has been the case. However it seems to me that when we are talking about allocating millions of dollars of taxpayer funds the public should be able to review and comment- on prop 50- and any other taxpayer allocation of funds.	Public input to the RAC is solicited and encouraged as part of the actions listed in Table G-10. The text associated with Table G-10 will be modified to reflect this.
120	WEST-1	G-24			The Department of Water Resources' (DWR) Prop 50 Ch 8 IRWM Grant Program Guidelines state on page 17 (C) that "The Plan must address major water related objectives and conflicts within the region..." The San Diego IRWMP covers approximately 23% of the Santa Margarita River Watershed (SMR), which is the most adjudicated watershed in the region. The SMR is an important water source for the north county area. It provides potable surface water to Camp Pendleton and residents in the De Luz and Fallbrook areas, and groundwater recharge that benefits private residents in the North County area as well as the communities of Fallbrook and Oceanside. Reclamation recommends that the IRWMP report better identify how the plan will work to strengthen and coordinate regional planning efforts with jurisdictions and water-wastewater agencies in southwest Riverside County located within the entirety of SMR watershed.	Efforts have been initiated (see Section .4) to coordinate San Diego Region IRWM planning efforts with the Riverside and Orange County IRWM Plan efforts. As noted in Section O.4, San Diego Region RWGM representatives will continue to coordinate with these Riverside and Orange County efforts. Coordinating between the regional plans must be a cooperative and evolving effort, and internal planning efforts and institutional structures within each region must be better developed in order to evaluate and implement specific means of strengthening coordination among the efforts. To ensure continued coordination, an action item will be added to Table G-10 (page G-24) for coordinating the update of the San Diego Region IRWM Plan with southwest Riverside County. The Region's agencies will look toward USBR and other interjurisdictional agencies to help assist in this future coordination between the San Diego, Riverside, and Orange County IRWM efforts.
121	WEST-2	G-24			The IRWMP also covers approximately 23% of the Tijuana River Watershed (TRW). Although the TRW crosses international boundaries, there are government agencies, organizations and quasi-government entities working to resolve cross-border issues and manage the entire TRW. Reclamation recommends that the IRWMP report better identify how the plan will work to strengthen and coordinate cross border planning efforts with U.S. and Mexico stakeholders.	Initial coordination efforts have been initiated, but Section O.5 will be revised to note that coordination with watershed management activities in the Tijuana watershed will be pursued. One means of coordination will be through participation and promotion of the Las Californias Binational Conservation Initiative (an IRWM Plan project). More specific coordination measures must await (1) development of the Region's IRWM institutional structure, and (2) coordination consensus and direction received from the institutional participants. To ensure continued coordination, an action item will be added to Table G-10 (page G-24) for coordinating the update of the San Diego Region IRWM Plan with U.S./Mexico cross border entities. The Region's agencies will look toward the federal government to assist in this international coordination.
<b>SECTION H COMMENTS</b>						
122	TUCK-59	H-3		Ecosystem Improvement section, 4 <sup>th</sup> bullet	Change to read "creation of wetlands, buffers, or other habitat"	The recommended correction will be made.
123	TUCK-60	H-5		(last paragraph) species also represents...	"represents" should be "represent"	The recommended correction will be made.
124	KIM-13	H-10		H-2	The impacts in Table H-2 for desalination omits the impingement and entrainment losses to marine life. The fact that EPA has officially suspended the Phase II rule on CWA Section 316(b) for once-through -cooling supports the fact that seawater intakes such as that used at the Encina power plant and planned to be used as the feedwater source for the desalination project are harmful to marine life. Information on 316(b) is available on line at : <a href="http://www.epa.gov/waterscience/316b/">http://www.epa.gov/waterscience/316b/</a>	Impingement and entrainment will be added to the potential long-term impacts for seawater desalination.
125	TUCK-62	H-16		(last paragraph) "... Water Project to..."	Should read "State Water Project water to San Diego"	The recommended correction will be made.
<b>SECTION I COMMENTS</b>						

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126	TUCK-63	I-2		"...watershed plans provide the basis..."	Should read "...watershed plans that provide the basis..."	The recommended correction will be made.
127	TUCK-64	I-4		(last paragraph) "...The Responsible..."	Repetitive with text on page I-10?	The repetitive text will be deleted.
128	PANG-8	I-5		Table I-1	Change project title from "Green Mall LID Porous Paving and Infiltration" to "City of San Diego Green Mall Porous Paving and Infiltration, Phase I."	The project title will be modified as suggested.
129	PANG-10	I-5		Table I-1	Change project title from "Green Street LID Porous Paving and Infiltration" to "City of San Diego Green Street Porous Paving and Infiltration, Phase I."	The project title will be modified as suggested.
130	PANG-12	I-5		Table I-1	Change project title from "Municipal Rooftop Rain Harvesting and Downspout Disconnections" to "City of San Diego Municipal Rooftop Rain Harvesting, Phase I."	The project title will be modified as suggested.
131	PANG-14	I-5		Table I-1	Change project title from "Watershed-Based Street Sweeping Program" to "City of San Diego Watershed-Based Street Sweeping Program, Phase I."	The project title will be modified as suggested.
132	TUCK-65	I-10		Program Performance section	Repetitive with text on page I-4	The repetitive text will be deleted.
133	TUCK-66	I-10		"...Programs leads."	Should read "Program leads"	The recommended correction will be made.
<b>SECTION J COMMENTS</b>						
134	ASH-25	J-5		Table J-2	Please recognize the Lagoon TMDL currently underway for 7seven lagoons in the region for bacteria, sediment, nutrients and TDS. Investigation Order 2006-076. RWQCB contact is Cynthia Gohram-Test (858)467-2957. This TMDL will shape water quality in the region for some time to come.	Table J-2 and the IRWM Plan text will be modified as suggested.
135	HAZ-1	J-8	All	Academic and Research Institutions	This section should include the work completed through the La Jolla Shores Coastal Watershed Management Plan: The Coastal Observing Research and Development Center (CORDC) at Scripps Institution of Oceanography (SIO) participated in the La Jolla Shores Coastal Watershed Management Plan as the lead for Information Management within the ASBS. The team at SIO implemented an end-to-end information management system for the regulatory data collected within the ASBS. This system consisted of automated data transfer and ingestion, data archiving and backup, public display of data and historical data download. SIO first modified the SWAMP templates to fit the suite of variables collected for the SIO NPDES permit. For a given data type, the templates contain full relationships and input fields. Completed templates are emailed and automatically ingested into the backend database. The backend database was also leveraged from the SWAMP system. The MS Access system was reprogrammed in a LINUX based MySQL database. Ingestion was automated through programmed parsing scripts. The scripts read template files, stripped out values and loaded them into the appropriate tables within the backend.	The information will be incorporated into Section J as suggested.
136		J-8	2	Academic and Research Institutions	SCCOOS was established by a consortium of research organizations that extends from Northern Baja California in Mexico to Morro Bay at the southern edge of central California, and aims to streamline, coordinate, and further develop individual institutional efforts by creating an integrated, multidisciplinary coastal observatory in the Bight of Southern California to provide data and information primarily for the benefit of society. SCCOOS aims to integrate a broad suite of observations to include but not limited to: surface currents, satellite imagery, wave conditions and forecasts, meteorological conditions and forecasts, water quality, ocean temperature, salinity, chlorophyll, and density in the form of products and raw data. The SCCOOS data management team has developed a number of innovative data interfaces and products, leveraging google maps to provide localized, zoomable, and navigable interactive display of data. This effort allows scientists, decision makers, and the public access to products that will provide a scientific basis for research, management, and improved uses of the ocean environment.	The information will be incorporated into Section J as suggested.
137	CK-1	J-10	1	n/a	Change from: The San Diego Coastkeeper also coordinates regionally focused citizen-monitoring efforts. This includes both observational monitoring (filling out a form providing a physical description of the waterway and mailing it or e-mailing it in) and water quality monitoring of water chemistry measurements. The San Diego Coastkeeper hosts the San Diego Citizen Watershed Monitoring Consortium to coordinate World Water Monitoring Day and coordinates citizen who are interested in getting involved with gathering data to improve and protect the surface waters of San Diego. Change to: The San Diego Coastkeeper Water Quality Monitoring program currently tests all San Diego County watersheds on a monthly basis by mobilizing and training members of the community. The goal of the monitoring activities is to develop a comprehensive assessment of surface water quality throughout the county for the purpose of (a) addressing non point source pollution; (b) establishing a baseline to protect unimpaired water bodies; and (c) identifying impaired water bodies and potential sources of impairment through regular monitoring. All monitoring t	Section J of the IRWM Plan will be modified as suggested.
138	TUCK-68	J-11		"...and regional MSCP efforts..."	MSCP efforts are a sub-regional plan	The recommended correction will be made.
139	TUCK-69	J-11		"...part of these regional MSCP efforts..."	Should read "...part of these sub-regional habitat conservation programs (e.g., MSCP South)	The recommended correction will be made.



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140	TUCK-73	J-13		General comment on whole page		The recommended correction will be made.
141	TUCK-74	J-17		Habitat and Natural Resource Monitoring	In some areas, habitat maps are over 10 years old and are in need of updates.	Text will be revised to note this fact.
142	TUCK-75	J-17		"Regional habitat mapping efforts..."	Should read "Habitat mapping efforts..."	The recommended correction will be made.
143	TUCK-76	J-17		Habitat and Natural Resource Monitoring	The state has contracted with San Diego State University who is working with USGS and USFWS to explore protocols, data analysis, and query tools to make this data easier to collect and understand.	This fact will be added to the page J-17 text.
144	TUCK-77	J-22		General comment	The Stat of California BIOS (Bio-geographic Information and Observation System) is a new database for habitat and species monitoring.	Reference to the BIOS system will be added to Section J.
145	TUCK-78	J-25		"...data to the CERES and CEDEN ..."	BIOS should be referenced	Reference to the BIOS system will be added to Section J.
146	HAZ-3	J-26	Reference		Include the Coastal Observing Research and Development Center (CORDC) ASBS Information Management: <a href="http://cordc.ucsd.edu/projects/asbs">http://cordc.ucsd.edu/projects/asbs</a>	The information will be incorporated into Section J as suggested.
147	HAZ-4	J-26	Reference		Include the Southern California Coastal Ocean Observing System (SCCOOS): <a href="http://www.sccoos.org">www.sccoos.org</a>	The information will be incorporated into Section J as suggested.
<b>SECTION K COMMENTS</b>						
148	TUCK-79	K-1		"...thousand personnel hours of staff..."	Duplicative?	The recommended correction will be made.
149	TUCK-81	K-7		"...subsequent funding cycled..."	Should read subsequent funding cycles.	The recommended correction will be made.
<b>SECTION M COMMENTS</b>						
150	KIM-14	M-1			The Coastal Commission is notably absent and should be added as it oversees consistency with local coastal programs, permitting agency for seawater desalination, protection of coastal resources, etc.	Text will be added to Section M to note the role of the Coastal Commission.
151	TUCK-82	M-4		SANDAG RCP	Adopted in 2004, not 2005	The recommended correction will be made.
152	TUCK-83	M-4		"Smart Growth Concept"	Should read "Smart Growth Concept Map"	The recommended correction will be made.
153	NYG-39	M-5		Table M-2	This table is very misleading about habitat protection. Having an area covered as part of a regional plan does not mean the local agency has adopted it- and in the case of north county only 1 of 7 cities have adopted a sub-area plan. The one that has an approved plan, the city of Carlsbad, has not implemented management of the city-owned land. The plan should distinguish between regional and locally approved plans. In many cases having the regional without an approved local plan and without funding of the local plan means very little.	Table M-2 is intended to show that a number of land use agencies within the Region have participated in a variety of water-related planning activities. The table will be re-labeled to indicate this.
154	NYG-40	M-5		Table M-2	Carlsbad should be footnote#7 with clarification that they have an adopted HMP.	Table M-2 will be modified to incorporate the suggested information.
155	TUCK-85	M-5		Table M-2	Check for accuracy, some jurisdictions with approved habitat conservation plans have not adopted the plans at the local level (e.g. San Marcos and Vista).	Table M-2 will be footnoted to note that habitat conservation plans have not been adopted by all municipalities.
156	NYG-41	M-6	1			The text on page M-6 will be modified to incorporate the suggested information.
157	NYG-42	M-6	3rd bullet		SANDAG has not held the broad stakeholders group meeting described here for over 4 years. They have been meeting with the cities and wildlife agencies- but have neglected other key stakeholders. A key thing they are doing that should be added is evaluating funding options for the shortfall in habitat management funding- as part of the mandate of Transnet that said the regional habitat funding source should be planned for the ballot in 2008.	Bullet will be modified to note that SANDAG has been meeting with Cities and wildlife agencies.
158	TUCK-84	M-6		Habitat Protection Plans, second bullet	County is not involved and not implemented by 9 jurisdictions; only 6 have approved implementing agreements.	The text will be revised to delete the reference to 9 municipalities.
159	TUCK-86	M-6		Habitat Protection Plans, third bullet	Should read "TransNet Environmental Mitigation Program, where SANDAG coordinates with local jurisdictions, wildlife agencies, the building industry, and environmental groups/stakeholders to acquire open space for mitigation and provide funding for management and monitoring."	The recommended correction will be made.
160	ASH-17	M-8		T-M-3	Add subwatershed plans within the Carlsbad Watershed, including the <i>Escondido Creek Watershed Restoration Action Strategy</i> (see Appendix and the <i>Agua Hedionda Creek Watershed Management Plan</i> (currently under preparation with Prop 40 Grant Funding and recommended by the SWRCB to be part of the IRWM process). See below for description.	Section M.1 will be modified as suggested.
161	NYG-43	M-8		Table M-3	Should add that a Watershed management Plan for the Agua Hedionda sub-watershed of the CHU is currently in process.	Table M-3 will be modified to incorporate the suggested information.
162	NYG-44	M-8	Footnote 7	Table M-3	List of CWN members is not correct. CWN "membership" is only the NGO's that signed an MOU- I can provide that list.. If you want to identify those who were involved in the preparation of the WMP for the CHU that is a different list- and should be taken from the list included in the report.	The footnote will be revised to cite only NGOs as CWN members.

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163	ASH-18	M-9		T-M-4	Footnote 4: <del>The County served as lead agency with urban runoff Copermittees to develop a</del> <u>The Copermittees within each watershed developed independent Watershed Urban Runoff Management Plans with the County acting as the lead coordinating agency.</u>	Footnote 4 will be modified as suggested.
164	TUCK-87	M-9		"...will be reviewed detail and..."	Should read "...will be reviewed in detail and..."	The recommended correction will be made.
165	JMEG-17	M-10			There is a bit of confusion here because the SCWRP region is the Southern California Bight (Pt Conception in Santa Barbara to the border with Mexico). A total of 17 projects are on the SCWRP Work Plan in SD County. There are a total of 72 projects on our Work Plan throughout our region. The 17 projects in SD County have been placed on the Work Plan because of their regional importance. This demonstrates a true regional integration.	Text on page M-10 will be modified to reflect the comments.
166	TUCK-88	M-10		"Encourage Community involvement..."	Should be "Encourage community involvement..."	The recommended correction will be made to page M-10.
167	TUCK-89	M-14		"(e.g. flood control plan...(e.g. flood..."	The use of both examples is repetitive.	Repetitive text will be deleted from page M-14.
168	VERR-2	M-15	NA	Section M	DGS recommends that Table M-6 be revised to include a new category of Agency, Public Facilities Management Agencies. DGS and similar agencies through the Region have been directed to oversee the design, construction, maintenance, and management of public facilities in all of the hydrologic units included in the Draft IRWMP. Implementation of the plans of these agencies does have significant impact on water quality, runoff reduction, groundwater recharge, and many other factors and strategies cited in the Draft IRWMP. The plans of these agencies, represented as Capital Improvement Plans and Strategic Facility Plans, are essentially public facility "Land Use Plans". The County of San Diego, DGS for example, currently plans and manages over 85 facilities and sites located throughout nine regional watersheds. DGS is currently planning and/or designing 6 new or remodeled facilities.	Table M-6 will be revised as suggested.
169	TUCK-90	M-17		"San Diego Association of Governments"	Should read SANDAG	The recommended correction will be made to page M-17.
<b>SECTION N COMMENTS</b>						
170	TUCK-91	N-5		"Project Clean water is an inclusive..."	Repetitive with page N-3	Repetitive text will be deleted from page N-5.
171	TUCK-92	N-6		"...RAC member or as an advisory role..."	Should read "RAC member or as an advisor..."	The recommended correction will be made to Section N.2.
172	JMEG-18	N-7			SCWRP is not currently part of EHC's SD Bay Campaign, although we are supportive of their efforts. I don't think the SCWRP has helped the RAC address disadvantaged communities. And I think Coastkeeper only does peripherally. I think we need representatives from the disadvantaged communities to represent themselves.	The text on page N-7 will be modified to reflect the comments, and the importance of the IRWM Plan short-term priority action plans (see Tables G-5 and G-6) will be noted.
173	TUCK-93	N-7		"Bario Logan..."	Should read "Barrio Logan"	The recommended correction will be made to Section N.2.
174	TUCK-94	N-11		"...and a developing and implementing..."	Should read "...and developing and implementing..."	The recommended correction will be made to Section N.2.
175	TUCK-95	N-13		(last paragraph)"... areas identified being..."	Should read "...areas identified as being..."	The recommended correction will be made to Section N.3.
176	TUCK-96	N-14		(first paragraph) "...the needs to those..."	Should read "...the needs of those..."	The recommended correction will be made to Section N.3.
<b>SECTION O COMMENTS</b>						
177	TUCK-97	O-1		Section O Summary	San Diego Association of Governments is redundant with SANDAG	The recommended correction will be made to page O-1.
178	JMEG-19	O-3			Another state agency to consider is the Coastal Conservancy, which provides funding for coastal restoration, protection, and access.	The Coastal Conservancy will be added to the list of other state agencies.
179	KIM-15	O-3			Coordination. CalTrans should be added because it is involved in land use, air and water quality impacts of surface transportation modes. Coastal Commission, State Lands Commission should be added as they are the agency overseeing lands held in public trust	Caltrans will be added to the list of state agencies.
180	TUCK-98	O-4		"...of federal NPDES permit, water..."	Should read "...of federal NPDES permits, water..."	The recommended correction will be made to page O-4.

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181	ASH-16	O-6	3		In addition, the San Diego IRWM is coordinating with the La Jolla Shore Integrated Coastal Watershed Management (ICWM) Plan . The La Jolla Shores ICWM Plan was funded as an IRWM and includes a coastal watershed that discharges into the Regions only two Areas of Special Biological Significance (ASBS). The La Jolla Shores ICWM is fully within the San Diego region.	Page O-6 will be modified as suggested.
182	TUCK-99	O-6		"...representatives from the south Orange"	Remove "the"	The recommended correction will be made to page O-6.
183	TUCK-100	O-7		"...SANDAG has been invited..."	Present tense	The recommended correction will be made to page O-7.