

Appendix 6-D: Stakeholder Comments on 2019 Draft IRWM Plan - Phase 1



Comments Received on the Draft 2019 IRWM Plan - Phase 1

Comment Period: August 17 - September 14, 2018

#	Date Received	Commenter	Plan Section	Page Number	Comment	Response
32	9/14/2018	Rincon del Diablo	1.2.4 Existing Planning Environment	1-8	[Regarding Environmental Justice communities] What is this? Not a recognized area or community so would stay with DAC, EDA, etc.	Revised to "communities affected by environmental justice (EJ) issues"
33	9/14/2018	Rincon del Diablo	1.2.4 Existing Planning Environment	1-8	[If EJ is removed per comment above] add "and" between "...(EDA, and underrepresented communities (URC)."	Revised sentence for grammar
45	9/14/2018	Rincon del Diablo	Table 1-2	1-18	[4. Stakeholder Involvement] Delete references to EJs	No change.
75	9/14/2018	Rincon del Diablo	3.3.3 Underrepresented and Environmental Justice Communities	3-13	Recommend deleting "Environmental Justice Communities"	Revised introduction language for EJs to explain it means "communities experiencing EJ issues" and that EJs are a subset of URCS. Added a call-out box explaining the differences between DACs, EDAs, URCS, and EJs. Call out box explains how these communities are mapped or not. Revised language associated with mapping EJs (Section 3.3.3) to reflect the EJScreen and CalEnviroScreen tools shows communities that experience EJ issues.
76	9/14/2018	Rincon del Diablo	3.3.3 Underrepresented and Environmental Justice Communities	3-13	U.S. EPA Environmental Justice definition is too nebulous and it really applies to all	See response to comment 75
77	9/14/2018	Rincon del Diablo	3.3.3 Underrepresented and Environmental Justice Communities	3-13	[first paragraph, about EJ] This is getting too much into social engineering issues and beyond IRWM. Too much.	See response to comment 75
79	9/14/2018	Rincon del Diablo	3.3.4 DAC, EDA, and URC Considerations	3-15	Delete references to EJ as part of URCS	See response to comment 75
80	9/14/2018	Rincon del Diablo	Urban DACs/EDAs/URCs Issues and Needs	3-20	Technically we're all EJs, as it all impacts us/everyone in San Diego.	See response to comment 75
81	9/14/2018	Rincon del Diablo	Urban DACs/EDAs/URCs Issues and Needs	3-21	Remove reference to EJs.	See response to comment 75
86	9/14/2018	Rincon del Diablo	Urban DACs/EDAs/URCs Issues and Needs	3-22	[Third paragraph] remove references to EJ	See response to comment 75
90	9/14/2018	Rincon del Diablo	Community Support for DACs, EDAs, URCS, and EJs	3-26	Remove reference to EJs.	See response to comment 75
100	9/14/2018	Rincon del Diablo	Table 3-20	3-45	[Southern Regional treatment facility] is a part of SRTTP recycled water discharge is in San Luis Rey Watershed actually - most of it.	R9-2009-0021 indicates permitted use locations to be in Santa Margarita Watershed and San Luis Rey Watershed. Moved this to San Luis Rey Watershed
140	9/14/2018	Rincon del Diablo	Carlsbad Watershed - Internal Boundaries and Land Uses	5-32	Did [population growth from 500,000 to 700,000 people by 2015] happen?	No change. Based on the ACS estimates for Cities of Carlsbad, Escondido, Vista, San Marcos, Encinitas and one-third the population of Oceanside, the population is around 600,000, but in reality may be higher. Population estimates not available in WQIP; Project Cleanwater says 565,000 people based on 2010 Census data.
146	9/14/2018	Rincon del Diablo	6.1 Overview	6-1	Remove reference to EJs.	See response to comment 75
152	9/14/2018	Rincon del Diablo	6.3.1 Regional Water Management Group - photo	6-7	Replaced with an updated photo of the RWMG members.	Done.
156	9/14/2018	Rincon del Diablo	6.4.1 Environmental Justice and Disadvantaged Communities	6-24	[Environmental Justice] is everyone. No matter who or where, so let's not go overboard. DAC/EDA/URC is focus.	See response to comment 75
157	9/14/2018	Rincon del Diablo	6.4.1 Environmental Justice and Disadvantaged Communities	6-24	[this page] is a repeat of other chapters	This section is intended to summarize what is described in more detail in Chapter 3. Have shortened to remove detailed definitions of DACs that repeated Chapter 3.
158	9/14/2018	Rincon del Diablo	6.4.1 Environmental Justice and Disadvantaged Communities	6-25	Remove reference to EJs.	See response to comment 75
160	9/14/2018	Rincon del Diablo	6.4.1 Environmental Justice and Disadvantaged Communities - Directed Outreach Programs for DACs and EJ Communities	6-25	[First paragraph, regarding comments disproportionately impacted...due to race, culture, or income] Dangerous! Rules, rates, laws set at various levels and Prop 218/26 require certain things to be done. We all face the same thing.	See response to comment 75
164	9/14/2018	Rincon del Diablo	6.4.1 Native American Tribes	6-30	There has also been 2 recent bills passed to related to tribe and water from natural agencies. That's a positive. SDCWA also had issues with tribes, so it's a 2-way street.	Will revise to reframe focusing on progress made, and acknowledge past issues while focusing on positive changes since then. Will consider 1944 and the Sycuan/SDCWA/Padre Dam agreement from last year and see if we can fold those in.
196	9/14/2018	Rincon del Diablo	10.2.1 Data Needs - Invest in DAC-EDA-URC-EJ Water Systems	10-3	Remove references to EJs	See response to comment 75
197	9/14/2018	Rincon del Diablo	10.2.1 Data Needs - Invest in DAC-EDA-URC-EJ Water Systems	10-3	EJ communities are not real things - DAC, EDA, and URC are - EJ is a concept.	See response to comment 75

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206	9/14/2018	Rincon del Diablo	11.3.1 Potential Benefits and Impacts - Benefits and Impacts to DACs, EDAs, URCs, EJs, and Native American Tribal Communities	11-15	Remove references to EJs. There is no such thing as an EJ community.	See response to comment 75
207	9/14/2018	Rincon del Diablo	11.3.1 Potential Benefits and Impacts - Benefits and Impacts to DACs, EDAs, URCs, EJs, and Native American Tribal Communities	11-16	Remove references to EJs.	See response to comment 75
208	9/14/2018	Rincon del Diablo	Table 11-3 Summary of Potential Impacts and Benefits	11-17	[Objective B] remove references to EJs	See response to comment 75
209	9/14/2018	Rincon del Diablo	Table 11-3 Summary of Potential Impacts and Benefits	11-21	[Objective H] Remove references to EJs. This should be DAC/URC or EDA instead.	See response to comment 75
220	9/17/2018	City of Oceanside	1.3.2 City of San Diego	1-13	[think BLUE logo] check that City of SD is still using this... I had thought the copermitees all rallied under the Project Clean Water banner now, but I could be mistaken.	City approved use of Think Blue Logo. No Change.
236	9/17/2018	City of Oceanside	3.3.4 DAC, EDA, and URC Considerations	3-25	editorial comment: throughout this entire section, "DACs, EDAs, and URCs" is used so much to where it eats up space and disconnects the reader's attention from your message. use a singular term, like "disadvantaged areas" if possible to reduce the clutter.	No change.
247	9/17/2018	City of Oceanside	5.3 San Luis Rey Watershed	5-22	[last paragraph] if possible I recommend updating this section (and for each watershed where applicable) with information from the WQIPs as they describe current jurisdictional projects to improve water quality. Should probably also mention applicable TMDLs (bacteria at the pacific ocean shoreline)	Chapter 5 is not being updated comprehensively for the 2019 IRWM Plan. Have added WQIP briefly into San Luis Rey Watershed section
248	9/17/2018	City of Oceanside	5.3 San Luis Rey Watershed	5-23	[fifth paragraph] update here with WQIPs "...which focuses on management activities that can be taken to reduce stormwater runoff and associated water quality..."	Chapter 5 is not being updated comprehensively for the 2019 IRWM Plan. Have added WQIP briefly into San Luis Rey Watershed section
4	9/14/2018	Karin Zirk, Friends of Rose Canyon	N/A	N/A	The absence of integrated planning efforts for Rose Creek is a serious omission as the health of Rose Creek significantly impacts all these projects [related to planning in northeast corner of Mission Bay].	Outreach made to Friends of Rose Canyon for guidance on desired edits. Ultimately no changes made.
5	9/14/2018	Karin Zirk, Friends of Rose Canyon	Appendix 7B, Table 3-5: Examples of Community Watershed Programs	3-18 of App. 7B	...you listed Friends of Rose Creek. We do not focus on Los Penasquitos Creek...The Rose Creek Watershed Alliance, of which we are a member, focuses on the entire Rose Creek Watershed.	Thank you, this has been corrected in the Integrated Flood Management Study.
7	9/14/2018	Rincon del Diablo	Acronyms and Abbreviations	pg. xii	Header and Footer have the wrong dates and say "FINAL" instead of Draft	Corrected.
9	9/14/2018	Rincon del Diablo	1. Introduction	1-1	"one of the most populous areas in the nation" - this should be cited (according to Wikipedia, SD County is the 5th most populous county in the US. SD is the 8th most population City in the US)	ACS estimates for 2017 shows County of San Diego as the 5th most populous County in the U.S. Add citation "American Community Survey. 2017. American Fact Finder - Annual Estimates of the Resident Population: April 1 2010 to July 1, 2017. 2017 Population Estimates."
10	9/14/2018	Rincon del Diablo	1. Introduction	1-1	"The 2019 IRWM Plan Update presents and overarching assessment of the San Diego region's water supply, water quality and ecosystem challenges and provides recommendations for sustainable answers solutions."	Revised.
12	9/14/2018	Rincon del Diablo	1. Introduction	1-2	What about water agencies partnering with other water agencies on regional, beneficial programs that deal with issues across the board? - We need to say more about water agency partnerships	Recommend adding a bullet to the list: " <u>Water agencies have successfully partnered with one another on regional, beneficial programs, supported through IRWM and through their own initiatives. How can agencies and regulators in the region better support and encourage effective partnerships?</u> "
13	9/14/2018	Rincon del Diablo	1. Introduction	1-2	[Second bullet] "New Stormwater runoff regulations align well with water conservation best management practices (BMPs)..."	Revised.
14	9/14/2018	Rincon del Diablo	1. Introduction	1-2	[Fourth bullet] add comma to "...regulators, and others..."	Revised.
15	9/14/2018	Rincon del Diablo	1. Introduction	1-2	[Sixth bullet] How can federal and state/local resources be better combined and maximized?	Recommend adding a bullet to the list: " <u>The Region includes land use and water resource jurisdictions that span federal, state, and local levels. How can federal, state, and local resources be leveraged together to increase benefits to the region's water-related resources?</u> "
16	9/14/2018	Rincon del Diablo	1. Introduction	1-2	[Seventh bullet] add comma to "...regulators, and others..."	Revised.
17	9/14/2018	Rincon del Diablo	1. Introduction	1-2	"These are but a few of the questions that the San Diego region must begin <u>have begun</u> to answer"	Revised.
18	9/14/2018	Rincon del Diablo	1. Introduction	1-2	"This often creates jurisdictional complexity for water management"	Revised.
19	9/14/2018	Rincon del Diablo	1.1 IRWM Planning	1-2	Revise "IRWM planning is a relatively new <u>evolved from a California initiative...</u> "	Revised.
20	9/14/2018	Rincon del Diablo	1.1 IRWM Planning	1-3	"San Diego RWMG published its first IRWM Plan in 2007..."	Revised.
21	9/14/2018	Rincon del Diablo	1.1 IRWM Planning	1-4	Nothing else [to add to the list of Phase 1 Plan updates]?	Include SWRP into the list of updates to the Plan.

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22	9/14/2018	Rincon del Diablo	1.1.1 The "I" in IRWM	1-4	This [the first paragraph of this section] makes it sound that water agencies and others (humans) are destroying the environment by being water purveyors and users.	Revise to "These human influences <u>can</u> change the natural flow of water within the hydrologic cycle, <u>and</u> where the potential for negative impacts to occur is present, must be managed to <u>avoid negative outcomes, while supporting the positive goals of water-resource projects (such as decreasing reliance on imported water, protecting water quality, etc.) ensure that negative impacts don't result.</u> "
23	9/14/2018	Rincon del Diablo	1.1.1 The "I" in IRWM	1-4	There are many positive impacts from these water resource actions - reduced GHGs, less dependence on imported water, improved groundwater and meeting nutrient loads, etc. [regarding "These human influences change the natural flow of water within the hydrologic cycle and must be managed to ensure that negative impacts don't result."]	See response to comment #22
24	9/14/2018	Rincon del Diablo	1.1.1 The "I" in IRWM	1-4	They [organizations] already do [work together in a mutually supportive manner].	Revised sentence to read "IRWM planning seeks to integrate decision-making by the different water managers so that their management activities <u>can further</u> work together in a mutually supportive manner."
25	9/14/2018	Rincon del Diablo	1.2.4 Existing Planning Environment	1-6	Should we add AB 1668 and SB 606 as new requirements, or mention them?	Agreed. AB 1668 and SB 606 are being incorporated into the Plan where appropriate.
26	9/14/2018	Rincon del Diablo	1.2.4 Existing Planning Environment	1-6	"...(the other two member agencies are not large enough to not meet the threshold for preparing an UWMP)..."	Revised.
27	9/14/2018	Rincon del Diablo	1.2.4 Existing Planning Environment	1-6	Add comma to "These UWMPs provide a summary of water use, wastewater volumes, and recycled water opportunities..."	Revised.
28	9/14/2018	Rincon del Diablo	1.2.4 Existing Planning Environment	1-6	"The San Diego Water Board is responsible for regulating activities that affect the quality of the Region's..."	Revised.
29	9/14/2018	Rincon del Diablo	1.2.4 Existing Planning Environment	1-7	[Second full paragraph, regarding the 10 WMAs] Be nice to reference their watersheds again or refer to a figure	Added a new figure to show watersheds and water management areas
30	9/14/2018	Rincon del Diablo	1.2.4 Existing Planning Environment	1-7	[Last paragraph, regarding the 15 Adaptation Concepts] So is this later addressed? Maybe breakout, since they are important	Added a call-out box of the 15 Adaptation Concepts in the Basin Study
31	9/14/2018	Rincon del Diablo	1.2.4 Existing Planning Environment	1-8	Add comma to list at the top of the page "...environmental justice, and other values in the region."	Revised.
34	9/14/2018	Rincon del Diablo	Table 1-1: Summary of Water Management Responsibilities for Regional Water Management Group	1-9	If its member agencies have it [water supply], shouldn't the SDCWA's boxes be checked...like Yuima and groundwater? Escondido and recycled water? Etc.	Added footnote to Water Authority column that open dots (provides planning support) generally indicates that its member agencies are responsible for these categories as related to the Water Authority's purview (e.g., even though some of the Water Authority's member agencies are responsible for Municipal Stormwater NPDES Management, it's not related to the Water Authority's purview, and is therefore not included for the Water Authority)
36	9/14/2018	Rincon del Diablo	1.3.1 San Diego County Water Authority	1-12	Move the "City of San Diego is the Water Authority's largest member agency in terms of land area, population, and water purchases." to Section 1.3.2 City of San Diego.	Moved per suggestion
38	9/14/2018	Rincon del Diablo	1.3.1 San Diego County Water Authority	1-13	They [SDCWA] are taking credit here [for recycled water use, development of local groundwater supplies] but not in the chart on pg. 1-9 [Table 1-1]	A footnote has been added to Table 1-1 clarifying the Water Authority is supporting these efforts by its member agencies.
39	9/14/2018	Rincon del Diablo	1.3.2 City of San Diego	1-13	[First sentence] "...administers a number of programs that provide opportunities to pursue integrated approaches..." Opportunities for who?	Clarified "opportunities <u>for the City and its partners</u> to pursue integrated approaches..."
41	9/14/2018	Rincon del Diablo	1.3.2 City of San Diego	1-13	[Last paragraph] Capitalize City at end of first sentence	Revised.
42	9/14/2018	Rincon del Diablo	1.3.2 City of San Diego	1-14	[End of first sentence] revise to say "...to protect and improve the water quality of rivers, creeks, bays and estuaries, and the ocean <u>within its jurisdiction.</u> "	Revised.
43	9/14/2018	Rincon del Diablo	1.5 Addressing the Region's Water Management Challenges	1-17	There is a weird line break [just above the photo]	This has been corrected in the Word file.
44	9/14/2018	Rincon del Diablo	1.5 Addressing the Region's Water Management Challenges	1-17	[Photo] Has it helped? The picture says 'no'	Revised caption to say "Rural Community Assistance Corporation (RCAC) is addressing water quality concerns in the Tijuana River Valley (<u>including trash, shown here</u>) through a project funded through Proposition 84."
46	9/14/2018	Rincon del Diablo	2.2 Describing the Process	2-1	Update bullet list to match the style on pages 1-3, 1-5, etc. Start each bulleted item with lowercase	Revised
47	9/14/2018	Rincon del Diablo	2.2 Describing the Process	2-3	[First line] add "and" immediately before "...2) identify pressing regional issues..."	Revised.
48	9/14/2018	Rincon del Diablo	2.2 Describing the Process	2-3	[List at end of Section 2.2] Add comma "...ensuring that the IRWM vision, mission, goals, and objectives..."	Revised.
49	9/14/2018	Rincon del Diablo	2.3 Sustainability of Water Resources	2-3	[Last sentence of first paragraph] " Below you will find The San Diego IRWM Program's definition of sustainability is <u>shown below.</u> "	Revised.
50	9/14/2018	Rincon del Diablo	2.3 Sustainability of Water Resources - Definition of Sustainability for the 2019 IRWM Plan	2-3	[Bullet 1] "...maintaining the a community's quality of life..." [Bullet 3] "...water resources that support s the regional economy."	Revised.
51	9/14/2018	Rincon del Diablo	2.3 Sustainability of Water Resources	2-3	[List in final paragraph] Add comma to "...wetland and surface water conditions greenhouse gas emissions, resiliency, and life cycle costing..."	Revised.
52	9/14/2018	Rincon del Diablo	2.6 IRWM Goals - What do the San Diego IRWM Goals Mean for Me?	2-5	Title of call out box changes the tone. Kind of dumbs down this important document.	Revised to "How the IRWM Plan Goals Address Issues and Needs in the Region. What do the San Diego IRWM Goals Mean for Me? "
53	9/14/2018	Rincon del Diablo	2.7 IRWM Objectives	2-5	"Table 2-1 provides a "crosswalk" of the Plan..."	Revised.

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57	9/14/2018	Rincon del Diablo	Table 2-1: Crosswalk of San Diego IRWM Plan Goals and Objectives	2-6	Objective I and J - add open dot to Goal 1	Agree to add open dot to Goal 1 for Objective I. No change for Objective J because advancing water-based enriching experiences does not improve reliability and sustainability of water supplies directly or indirectly.
59	9/14/2018	Rincon del Diablo	Objective G	2-13	Photo caption - or infrastructure maintenance of old pipelines	Revised caption to say "One way to address cCommunity flood damage loss can be addressed is through integrated flood management solutions."
60	9/14/2018	Rincon del Diablo	Objective G	2-13	[Final paragraph] Add comma to list "Pollution loads due to runoff will reflect the change in residential, commercial, industrial, construction, and agricultural activities..."	Revised.
61	9/14/2018	Rincon del Diablo	Objective G	2-14	[Sentence at top of page] Add comma "...can prevent or decrease its impacts, mitigate its negative effects, and address the economic impacts..."	Revised.
62	9/14/2018	Rincon del Diablo	2.7.2 Climate Change Considerations	2-17	Can this [significant threat to the Region's water resources] be quantified?	San Diego Basin Study is quantifying impacts of climate change on water supply, but is still in development. Added statement that the Basin Study will be completed in 2019 and include this information.
63	9/14/2018	Rincon del Diablo	2.7.2 Climate Change Considerations	2-17	"We are already seeing the effects of climate change in the region, with extreme drought..." - yet SDCWA says we have the water to handle this. May want to review.	SDCWA's 2015 UWMP included climate change scenario planning (Chapter 10, Scenario 5) and strategies for addressing this uncertainty included studies to evaluate impacts of climate change on demand and supplies at the local level and development of local, drought-proof, supplies such as recycled water, potable reuse, etc. that are not likely to be strongly affected by climate change. Acknowledged that even under projected climate change impacts, there is supply reliability
64	9/14/2018	Rincon del Diablo	2.7.2 Climate Change Considerations	2-17	"We are already seeing the effects of climate change in the region..." - [we've experienced] 2 inches [of sea level rise] in the last 20 years. How much effect has that really had?	Revised to say "We are already seeing the effects of climate change in the region, with extreme drought, altered fire seasons, and moderate sea level rise."
65	9/14/2018	Rincon del Diablo	Climate Change framework graphic	2-18	Climate Resilience graphic - not appropriate! Looks like an exploding world.	Revised the graphic to avoid perception of exploding world.
66	9/14/2018	Rincon del Diablo	2.10 IRWM Plan Targets	2-19	"The targets and metrics for each objective are described in Table 2-3, below."	Revised.
67	9/14/2018	Rincon del Diablo	Table 2-3	2-26	[Objective F, Item 3] Add "X" to Water Supply, Wastewater, and Recycled Water	Agreed. Revised.
69	9/14/2018	Rincon del Diablo	3.1 Region Overview - Population	3-1	[Last sentence of "Population" section] "The portion of the County's population outside the Water Authority services area is mainly dependent on local groundwater supply."	Revised.
71	9/14/2018	Rincon del Diablo	"Wastewater Service"	3-11	Add a space after the hyphen and before the word "through"	Revised.
73	9/14/2018	Rincon del Diablo	3.3 Disadvantaged Communities, Economically Distressed Areas, and Underrepresented Communities	3-12	Second sentence - DACs should not be plural.	Revised.
74	9/14/2018	Rincon del Diablo	3.3.2 Economically Distressed Areas	3-12	MHI was previously defined in Section 3.3.1 (redundant)	Revised to use the initialism only here.
82	9/14/2018	Rincon del Diablo	Urban DACs/EDAs/URCs Issues and Needs	3-22	[First paragraph, regarding stormwater conveying pollutants] This is true for non-DAC areas as well	Revise to: "Stormwater runoff (as well as dry weather urban runoff) may thus convey pollutants contributing to the poor surface water quality in Urban DACs and EDAs, similar to how runoff conveys pollutants in other urban and developed areas."
83	9/14/2018	Rincon del Diablo	Urban DACs/EDAs/URCs Issues and Needs	3-22	[Second paragraph] "Although Though huge investments have been made..."	Revised.
84	9/14/2018	Rincon del Diablo	Urban DACs/EDAs/URCs Issues and Needs	3-22	[water quality issues in the Bay] Not just a DAC/EDA issue	Paragraph already notes that many (but not all) fishermen affected by pollution in the Bay are from DACs and EDAs. Revise "...additional water quality monitoring in Bay wetlands, again many of which are located near or in Urban DACs and EDAs. Low-lying Urban DACs and EDAs near the Bay will also suffer disproportionately from the effects of sea level rise as a result of climate change compared to their non-DAC or EDA counterparts that may also be directly affected by sea level rise."
85	9/14/2018	Rincon del Diablo	Urban DACs/EDAs/URCs Issues and Needs	3-22	[Third paragraph, last sentence] "...including newly planted fruit trees, which help to improve-increase access to fresh and healthy food options."	Revised.
87	9/14/2018	Rincon del Diablo	Rural DACs/EDAs/URCs Issues and Needs	3-23	"Rural DACs, EDAs, and URCs are primarily located outside of the jurisdictional boundaries..."	The SDIRWM Program has elected to define Rural communities as those not receiving municipal services. Added clarification that DACs with rural characteristics that receive municipal services are considered Urban DACs for the purposes of the IRWM Plan.
88	9/14/2018	Rincon del Diablo	Rural DACs/EDAs/URCs Issues and Needs	3-25	Some redundancy on issues throughout this section.	Section has been revised to reduce redundancy within the section. Some issues are common to both urban and rural DACs/EDAs/URCs, and so are included in both sections.
91	9/14/2018	Rincon del Diablo	Table 3-11: Member Agency Water Supply - Water Authority Service Area	3-29	Revise Rincon Del Diablo's supply numbers to match the 2015 UWMP: Total: 8,882 AFY Water Authority: 5,744 AFY Local: 3,138 AFY	Revised the table and updated all numbers to reflect 2015 volumes.
92	9/14/2018	Rincon del Diablo	Table 3-11: Member Agency Water Supply - Water Authority Service Area	3-29	Double check percent of supply from local sources, specifically for National City, Camp Pendleton, Rincon, San Dieguito WD, and Yuima MWD.	Revised the table and updated all numbers to reflect 2015 volumes.

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93	9/14/2018	Rincon del Diablo	3.5 Water Management Systems - Water Supply Outside Water Authority Service Area	3-31	This is where I think they have it wrong. There are 24 member agencies in their service area. The 24 member agencies contain "all but a small fraction..."	Revised to "All but a small fraction of the Region's over 3.2 million residents live within the <u>service areas</u> of the Water Authority's <u>24 member agencies service area</u> (refer to Table 3-1)."
95	9/14/2018	Rincon del Diablo	3.5.1 Water Authority Supplies - Imported Water	3-32	[Figure 3-6] shows Bud Lewis Desal Plant. Need correct figure [should refer to figure showing the aqueducts]	Revised to refer to Figure 3-7 not 3-6.
97	9/14/2018	Rincon del Diablo	Figure 3-6	3-35	On page 3-32, Figure 3-6 is said to show the aqueducts.	Have updated the reference on Page 3-32, per comment #95, above. Leave existing Figure 3-6 as-is.
98	9/14/2018	Rincon del Diablo	Table 3-14: Desalination Plant	3-35	What does the "2" stand for? Is it needed to be noted? [missing footnote]	Delete the placeholder for footnote 2
99	9/14/2018	Rincon del Diablo	3.5.4 Wastewater	3-44	I would have to believe that there is a lot of septic in the County (which could contribute to groundwater contamination). Perhaps worth discussing?	Add a paragraph discussing septic - generally where it's located, how it works, and any concerns that may be associated with septic, including what leads to the problems (faulty systems, high density of septic). Acknowledge that properly designed, installed, maintained septic is a safe treatment option.
101	9/14/2018	Rincon del Diablo	Table 3-20	3-45	Revised Southern and Northern Regional to include "TTP" at the end	Revised.
102	9/14/2018	Rincon del Diablo	Table 3-20	3-45	STP 11 and STP 12 - These [permitted secondary treatment capacity] are zero. SRTTP replaced the STPs in the south part of the base.	In 2015, Camp Pendleton reported 148 mgd secondary water used for percolation from STP 11 and STP 12. Future projected use was 0. Have revised footnote 42 to reflect this information.
103	9/14/2018	Rincon del Diablo	Table 3-20	3-45	Harmony Grove - should not be City of Escondido - it should be County of San Diego. Rincon is taking over.	WDR R9-2012-0054 was issued to County of San Diego Sanitation District. Revised agency to "County of San Diego/Rincon Del Diablo Municipal Water District."
104	9/14/2018	Rincon del Diablo	3.5.4 Wastewater	3-47	"Tertiary treatment filters secondary effluent through a medium such as coal-cloth or sand/disinfection to reduce total dissolved solids..."	Revised.
105	9/14/2018	Rincon del Diablo	3.5.4 Wastewater	3-47	"Planned projects would increase this capacity to 270 mgd and 230 mgd, respectively, by 2045" - of what? Primary? Tertiary?	Revised sentence to state "Planned projects would increase the <u>Region's secondary and tertiary capacities this capacity</u> to 270 mgd and 230 mgd, respectively."
106	9/14/2018	Rincon del Diablo		3-48	First bullet - Also brine from CPEN's AWT RO system	Will add to the list of brine discharged at the OOO
107	9/14/2018	Rincon del Diablo		3-50	Add fire suppression to the list of recycled water uses	Revised.
108	9/14/2018	Rincon del Diablo		3-50	"Since most-current recycled water is <u>currently predominantly</u> used for irrigation, recycled water demands vary..."	Revised
109	9/14/2018	Rincon del Diablo	Potable Reuse	3-52	IPR and DPR are now just PR. Changes in terminology - recent (quirk) law/legislation on all this - CA Water Reuse Pros. Good info.	Recommend revising to use "potable reuse" when talking generally about the topic, and limit use of IPR and DPR to only where the distinction matters.
110	9/14/2018	Rincon del Diablo	3.5.6 Groundwater Resources	3-55	" Al though this IRWM Plan uses the groundwater basins defined by Bulletin 118..."	Revised.
111	9/14/2018	Rincon del Diablo	3.5.6 Groundwater Resources	3-58	Bullet 3 - missing space between "approximately" and "7,000 AFY"	Revised.
112	9/14/2018	Rincon del Diablo	3.5.7 Conservation	3-60	add ..."both the SDCWA and all other agencies' systems" at the end of Item 1.	Revised.
113	9/14/2018	Rincon del Diablo	3.5.7 Conservation	3-60	delete the word "are" in the third sentence.	Revised.
114	9/14/2018	Rincon del Diablo	3.5.7 Conservation - Water Use Reduction Programs	3-60	There's the annual water audits that must be completed by the districts	Added.
115	9/14/2018	Rincon del Diablo	3.5.7 Conservation - Water Use Reduction Programs	3-61	There is no mention of SB 606/AB 1668, plus the new MWELO standards	Added.
116	9/14/2018	Rincon del Diablo	3.5.7 Conservation - Graywater	3-62	[second paragraph] "...permitting and regulations have presented significant barriers..." - It's a health issue and concern. This makes it sound like permits, rules, and regulations are bad!	Revised sentence to read: "Although the potential for graywater reuse to reduce potable water demand has long been recognized, <u>potential public health issues related to the use of graywater required additional time to develop permitting processes and regulations. As the use of graywater becomes more attractive to consumers, permitting and regulations are becoming more streamlined, helping to reduce permitting and regulations have presented significant barriers</u> to widespread implementation of graywater systems in the Region."
117	9/14/2018	Rincon del Diablo	3.5.7 Conservation - Graywater	3-62	Weird break/text not justified in second paragraph.	Corrected.
118	9/14/2018	Rincon del Diablo	3.5.7 Conservation - Rainwater Capture	3-62	"...benefits water quality through reduced stormwater runoff." - Yes and no - takes away from natural stream flows and can help "dilute"	Revised to "... <u>can</u> benefits water quality through reduced stormwater runoff..."
119	9/14/2018	Rincon del Diablo	3.5.7 Conservation - Rainwater Capture	3-62	[rainwater capture] it can potentially adversely alter natural flows into riparian habitat - which is not necessarily a good thing.	Added that rainwater capture can minimize peak flows and retain pollution onsite, but reduces flows to local watersheds.
120	9/14/2018	Rincon del Diablo	3.5.8 Stormwater Management - WQIP Call Out Box	3-65	"A key feature of the 2013 MS4 Permit is that is it provides an..."	Revised.
121	9/14/2018	Rincon del Diablo	3.5.8 Stormwater Management	3-66	How about weather variability - infrequent storm or rainfall, etc. [as a challenge to managing stormwater in the region].	Added to challenge of managing stormwater.
122	9/14/2018	Rincon del Diablo	3.5.8 Stormwater Management	3-68	We often see coastal flooding due to high surf during storms [non-precipitation-induced flooding].	Added to list of non-precipitation-induced flooding
124	9/14/2018	Rincon del Diablo	Table 3-25: District Operated Water Systems Outside the Water Authority Service Area	3-75	Where is Del Dios?	Supporting text for the table says that it includes only those MWCs and services districts with more than 200 service connections. Del Dios has fewer than 200 service connections, and therefore has been excluded. Revised the caption on the table to "Figure 3-25: District-Operated Water Systems Outside the Water Authority Service Area <u>With More Than 200 Connections</u> "
125	9/14/2018	Rincon del Diablo	3.6.7 Environmental Organizations	3-80	What about RCDs? Also resource management. [regarding list of conservancy groups]	Added.

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126	9/14/2018	Rincon del Diablo	Table 3-34: Recycled Water Quality	3-93	Harmony Grove - should not be City of Escondido - it should be County of San Diego/Rincon	WDR R9-2012-0054 was issued to County of San Diego Sanitation District. Revised.
127	9/14/2018	Rincon del Diablo	Wildlife and Endangered Species - photo	3-101	"The San Diego River provides an important habitat..."	Revised.
128	9/14/2018	Rincon del Diablo	Wildlife and Endangered Species	3-101	Add a semicolon at the end of Item (1)	Revised.
129	9/14/2018	Rincon del Diablo	Cost of Water Supply Diversification	3-114	We know actual cost now [of seawater desalination] - \$2,511 per AF	Reflect actual cost
130	9/14/2018	Rincon del Diablo	3.14 Climate Change	3-120	Add space between section number and section title	Revised.
131	9/14/2018	Rincon del Diablo	3.14 Climate Change	3-120	[Bullet 1] Add degree symbol to 7-9 degrees F	Revised.
132	9/14/2018	Rincon del Diablo	3.14 Climate Change	3-121	[second bullet, <i>Wildfire</i>] - second half of paragraph, starting with "With predicted changes in precipitation..." - Not in San Diego area. In other areas, yes.	Revised to "For example, the fall of 2017 experienced extremely warm, drive, and in some parts of the state, fiery conditions, followed by extreme rain events. As a result, severe erosion and mudslides occurred, washing the recently burned material downstream. <u>While San Diego did not experience mudslides in 2017, the conditions that led to mudslides elsewhere in the state are present in the San Diego region, and associated risk expected to increase due to the effects of climate change.</u> "
133	9/14/2018	Rincon del Diablo	5 Watershed Characterizations	5-1	First sentence, lower case "s" for "... (HUs)..."	Revised.
134	9/14/2018	Rincon del Diablo	Santa Margarita Watershed - Water Systems	5-11	"The westernmost segment of the Santa Margarita Watershed lies largely within the jurisdiction of the SDCWA's member agencies; lies largely within the jurisdiction of the San Diego County Water Authority, which provides imported water supplies to three of its member agencies located in the watershed..."	Revised.
135	9/14/2018	Rincon del Diablo	Santa Margarita Watershed - Water Systems	5-11	Add comma to list at the end of the second to last paragraph, after "Camp Pendleton"	Revised.
136	9/14/2018	Rincon del Diablo	Santa Margarita Watershed	5-13	Add comma to list in final bullet	Revised.
137	9/14/2018	Rincon del Diablo	Santa Margarita Watershed - Stormwater and Flood Management	5-14	Delete "the USMC" in front of "Camp Pendleton" for consistency	Revised.
138	9/14/2018	Rincon del Diablo	Santa Margarita Watershed - Natural Resources	5-14	Add comma to list in second sentence of first paragraph, after "oak woodlands"	Revised.
141	9/14/2018	Rincon del Diablo	Carlsbad Watershed	5-34	"The SNMP...determine if any reduction in loading is necessary, and identify potential ways to achieve load reduction."	Revised.
142	9/14/2018	Rincon del Diablo	Carlsbad Watershed - Natural Resources	5-35	Did the [power plant cooling system conversion to serve as intake for the Carlsbad Desal Plant] happen?	Revised. SDCWA currently working on intake modification permitting. Revised to "The intake for the Carlsbad Desalination Plant is located in the western reach of the Agua Hedionda Lagoon. The Water Authority is working on permitting required to modify the intake. These concerns will continue to be addressed through ongoing compliance with permitting requirements during the construction and operation of the desalination facility."
143	9/14/2018	Rincon del Diablo	San Dieguito Watershed - Internal Boundaries and Land Uses	5-42	Add or delete space for "55-mile"	Revised.
144	9/14/2018	Rincon del Diablo	San Dieguito Watershed - Water Quality and Water Quality Impairments	5-43	"Pollutants of concern and stressors within the watershed include nutrients, pathogens, salinity, pesticides, metals/metalloids, toxicity, and other organics and inorganics compounds"	Revised.
145	9/14/2018	Rincon del Diablo	San Dieguito Watershed - Water Quality and Water Quality Impairments	5-43	What about the toxic plume from the Superfund site on Bernardo/Felicita? Chatham Bro. Barrel Yard.	Added.
147	9/14/2018	Rincon del Diablo	6.1 Overview	6-1	Bring the picture down a bit so that the last line [on the page] doesn't stand alone.	Corrected.
148	9/14/2018	Rincon del Diablo	Table 6-1: Evolution of the San Diego IRWM Program	6-3	[2013 IRWM Plan Implementation - third bullet] delete space at beginning	Revised.
149	9/14/2018	Rincon del Diablo	Table 6-1: Evolution of the San Diego IRWM Program	6-3	[Future IRWM Plan Implementation - last bullet] move first half to end, so bullet reads "Will update the IRWM Plan in approximately 5 years, which will require corresponding outreach efforts, if funding is available or a need is identified."	Revised.
150	9/14/2018	Rincon del Diablo	6.3 IRWM Governance Structure	6-6	"Information-sharing and decision-making processes in the Region usually funnel up from the Workgroups or down from the Tri-County FACC..."	Revised.
151	9/14/2018	Rincon del Diablo	6.3 IRWM Governance Structure	6-6	References to Figure 6-2 are missing the "2"	Revised.
159	9/14/2018	Rincon del Diablo	6.4.1 Environmental Justice and Disadvantaged Communities - Directed Outreach Programs for DACs and EJ Communities	6-25	Remove reference to EJs and use DAC acronym	See response to comment 75
162	9/14/2018	Rincon del Diablo	6.4.1 Native American Tribes	6-29	What does the "lack of trust" mean?	Revised to focus more on positives.
163	9/14/2018	Rincon del Diablo	6.4.1 Native American Tribes	6-30	[first full paragraph, about past experiences of tribes dealing with County and State on water issues] Does stating this enforce their fears?	Will revise to reframe focusing on progress made, and acknowledge past issues while focusing on positive changes since then.

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165	9/14/2018	Rincon del Diablo	6.4.1 Native American Tribes - Engaging Native American Tribes	6-30	Remove periods at end of final bullet and third from final bullet. Revise final bullet to say "...allowing tribal projects to proceed"	Revised.
166	9/14/2018	Rincon del Diablo	Table 6-14 Agencies and Organizations Involved in Water and Watershed Management in the San Diego IRWM Region	6-35	Resize column so words don't break across 2 lines in header rows	Corrected.
167	9/14/2018	Rincon del Diablo	Table 6-14 Agencies and Organizations Involved in Water and Watershed Management in the San Diego IRWM Region	6-37	Under Rincon Del Diablo, add solid dot to wastewater column, and solid dot to RAC or Workgroup column. Rincon became a sewer agency this year.	Revised.
168	9/14/2018	Rincon del Diablo	Table 6-14 Agencies and Organizations Involved in Water and Watershed Management in the San Diego IRWM Region	6-39	Under U.S. Marine Corps Camp Pendleton, add open dot to Natural Resources	Revised.
169	9/14/2018	Rincon del Diablo	Escondido Valley Basin	7-23	"The Escondido Valley Basin is a Tier B groundwater basin and is managed in part primarily by Rincon del Diablo Municipal Water District..."	Revised.
170	9/14/2018	Rincon del Diablo	7.6.1 Relevant Flood Control Plans	7-26	[First paragraph] Use a hyphen for "flood plain analyses," and fix spacing.	Moved photo to reduce awkward spacing.
171	9/14/2018	Rincon del Diablo	7.6.2 Opportunities for Collaboration	7-26	[first bullet] " interconnecting an interconnection of flood risk management actions..."	Revised.
173	9/14/2018	Rincon del Diablo	7.9.2 Current Climate Change Study Efforts	7-43	"Thirty-eight (38) state agencies provided..."	Revised.
174	9/14/2018	Rincon del Diablo	7.10 Summary of Agency Coordination	7-45	Delete "River" in "Santa Margarita River" in the second paragraph	Revised.
175	9/14/2018	Rincon del Diablo	8.1.1 Resource Management Strategies in California Water Plan Update 2013	8-1	"Table 8-1 below lists RMS included within the CWP Update 2013 ..."	Revised.
176	9/14/2018	Rincon del Diablo	8.2.1 California Water Plan Update 2013	8-4	"Each of these RMS is included in Table 8-1 above and are analogous to those RMS..."	Revised.
177	9/14/2018	Rincon del Diablo	8.4.2 Urban Water Use Efficiency	8-7	"The Water Authority assists local water agencies in local water agencies assist the Water Authority in implementing urban water use efficiency programs, resulting in additional water conservation savings..."	Revised
178	9/14/2018	Rincon del Diablo	8.4.5 System Reoperation	8-9	There's room to make it [the bullet list] look better! Unjustify the bulleted areas, revised to remove the parentheses but do a hard enter so the reservoir's owner shows up underneath the reservoir name but still part of the same bullet.	Corrected formatting of the bullet list to make it more visually appealing.
179	9/14/2018	Rincon del Diablo	8.4.7 Conjunctive Management and Groundwater	8-11	Revised first sentence to say "10" instead of "ten"	Revised.
180	9/14/2018	Rincon del Diablo	8.4.7 Conjunctive Management and Groundwater	8-11	Last sentence, add "USMC Base" before "Camp Pendleton"	Leaving as-is for consistency with comment #137
181	9/14/2018	Rincon del Diablo	8.4.8 Desalination Brackish and Seawater	8-12	Abbreviate "U.S. Marine Corps" to "USMC"	Deleting U.S. Marine Corps for consistency with comment #137
182	9/14/2018	Rincon del Diablo	8.4.15 Matching Quality to Use	8-16	Recycled water for fire suppression is fairly unique but should be included	Added.
183	9/14/2018	Rincon del Diablo	8.4.17 Salt and Salinity Management	8-17	"Several environmental uses of water can be impacted by excessive salinity."	Add
185	9/14/2018	Rincon del Diablo	8.4.19 Agricultural Land Stewardship	8-19	Add "...and Resource Conservation Districts." to end of first paragraph [list of agencies that assist agricultural land stewardship]	Added.
187	9/14/2018	Rincon del Diablo	8.4.30 Water and Culture	8-24	"The Region's emphasis on conservation ethics means that demand management, is particularly important, particularly through times of drought."	Revised.
188	9/14/2018	Rincon del Diablo	9.4 IRWM Project Review	9-7	Number the two fundamental components in the second sentence.	Revised.
190	9/14/2018	Rincon del Diablo	9.4.1 IRWM Project Review and Selection Process	9-8	Weird break in the first paragraph	Corrected.
191	9/14/2018	Rincon del Diablo	9.4.1 IRWM Project Review and Selection Process	9-9	Revise Step 3 to read "Issue a Call for Projects that is long provides enough time to reasonably allow project sponsors to ask questions regarding the database, complete database forms, and revised previously submitted projects."	Revised.
192	9/14/2018	Rincon del Diablo	Table 9-1 Scoring Criteria for IRWM Grant Opportunities	9-12	Define "TBD" in table notes	Added footnote that says "Weighting will be determined by the RAC once a funding cycle has begun, and prior to the Call for Projects."
193	9/14/2018	Rincon del Diablo	10.2.1 Data Needs	10-2	[end of first sentence at top of page] Add comma to list, after "integrated planning"	Revised.
194	9/14/2018	Rincon del Diablo	10.2.1 Data Needs	10-2	[final paragraph in section before Sustainable Water Development] add "and" between item #3 and item #4	Revised.

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195	9/14/2018	Rincon del Diablo	10.2.1 Data Needs - Sustainable Water Development	10-2	Revise second sentence "...Colorado River Aqueduct (CRA) is expected to decrease, as impacts of climate change, such as drought and changing precipitation patterns, are more likely to occur in the future."	Revised.
198	9/14/2018	Rincon del Diablo	10.2.1 Data Needs - Enhance Infrastructure	10-4	"Asset management across the Region has been can be fragmented and siloed."	Revised.
199	9/14/2018	Rincon del Diablo	11.2.1 Implementation Action Plans for Regional Priorities	11-2	Add comma to the numbered list in the second paragraph	Revised.
200	9/14/2018	Rincon del Diablo	11.2.1 Implementation Action Plans for Regional Priorities - Land Use Planning Study	11-2	[Second sentence] "Since the 2013 IRWM Plan, a model sustainable landscapes-guide, a model stormwater..."	Revised.
201	9/14/2018	Rincon del Diablo	11.2.1 Implementation Action Plans for Regional Priorities - Land Use Planning Study	11-3	"The 2nd <u>second</u> IRWM Summit, held February 29, 2016..."	Revised.
202	9/14/2018	Rincon del Diablo	11.2.1 Implementation Action Plans for Regional Priorities - Land Use Planning Study	11-3	"At the summit, one speaker touch <u>acknowledged</u> the relationship between water resources and land use planning..."	Revised
203	9/14/2018	Rincon del Diablo	11.3 Benefits and Impacts	11-14	Move photo down one line.	Moved.
204	9/14/2018	Rincon del Diablo	11.3.1 Potential Benefits and Impacts - Regional Benefits and Impacts	11-14	"Implementation of the 2013 IRWM Plan (and achievement of the San Diego IRWM Objectives) is <u>has</u> resulted in substantial benefits to the Region.	Revised.
212	9/14/2018	Rincon del Diablo	11.5.1 Methods to Evaluate Plan Performance	11-35	What was the resulting grade [from the Report Card]?	Add summary sentence and link to report card on website.
213	9/17/2018	City of Oceanside	1 Introduction	1-2	[second bullet] ...and with regulators "How might stormwater and water agencies work together..."	Revised to "How might stormwater and water agencies work together <u>and with regulators</u> to efficiently partner on conservation programs?"
214	9/17/2018	City of Oceanside	1 Introduction	1-2	[fifth bullet] and what methods can the IRWM use to effectively solicit feedback from and engage these communities? "How can DACs most effectively participate in water management..."	Revised to "How can DACs most effectively participate in water management projects benefitting them, <u>and what methods can the IRWM Program use to effectively solicit feedback from and engage these communities?</u> "
215	9/17/2018	City of Oceanside	1.1 IRWM Planning	1-3	[last paragraph] and new science of climate change "...changes implemented as a results of the recent drought, new planning documents, and the ongoing succes..."	Added new understanding of climate change and its potential impacts to the list of reasons the Plan was updated.
216	9/17/2018	City of Oceanside	1.1 IRWM Planning	1-4	[first bullet] does this IRWM plan update also require inclusion of the regional Stormwater Resource Plan SWRP? "...understanding of stormwater resource capture and reuse opportunities for the region..."	Added the SWRP is being incorporated into the IRWM Plan.
217	9/17/2018	City of Oceanside	1.2.3 Benefits of Regional Approach	1-6	and across diverse disciplines (or expertise) "... and address the challenges that potentially exist among multiple planning efforts..."	Revised to "The IRWM planning process provides a mechanism for stakeholders to work together to identify and address the challenges that potentially existing among multiple planning efforts <u>and across diverse disciplines.</u> "
219	9/17/2018	City of Oceanside	1.3 Regional Water Management Group	1-12	[first paragraph] suggest ch[a]nging this to "Copermittees under the Regional MS4 permit" (or however referenced in the rest of the document) ... the language used here references RURMP which was a relic of the '07 MS4 permit. "...are the largest Copermittees in the regional urban runoff management program (stormwater program)."	Revised.
222	9/17/2018	City of Oceanside	2.3 Sustainability of Water Resources	2-3	[call out box; first bullet] I'm surprised to not see "affordability" (or equitable) here for provision of safe, reliable water supply... "Social: Fostering public health and safety and maintaining the community's quality of life through provision of..."	Revised.
223	9/17/2018	City of Oceanside	2.7 IRWM Objectives - Objective B	2-9	[first paragraph] ...and also finding ways to <i>listen to the community</i> . true, education is needed but also developing tools that let DAC residents communicate their concerns more effectively, and give managers suggestions for water-integrated community projects "Increasing public knowledge and understanding of the importance..."	Revised to "Increasing public knowledge and understanding of the importance of water resource management, <u>as well as finding ways to listen to the community and solicit input on finding solutions to common challenges,</u> is essential for garnering public support for IRWM projects..."
224	9/17/2018	City of Oceanside	2.7 IRWM Objectives - Objective D	2-10	[second paragraph after call out box] I'd recommend "peer-reviewed scientific understanding" stated somewhere in here.	Revised.

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225	9/17/2018	City of Oceanside	2.7 IRWM Objectives - Objective H	2-14	[second paragraph after call out box] specify "Federal Clean Water Act 303(d) list" if not stated earlier for clarity "...and 13 reservoirs are listed on the 303(d) list of impaired water bodies..."	Revised.
226	9/17/2018	City of Oceanside	2.7 IRWM Objectives - Objective H	2-14	[second paragraph after call out box] suggest giving an example here of how climate change can exacerbate pollution issues; such more frequent storms contributing wet weather pollutants, prolonged drought contributing to higher "first flush" pollutant loads, TDS issues in groundwater etc. you want to strengthen this linkage. "...systems better able to withstand the impacts from climate change."	Revised.
227	9/17/2018	City of Oceanside	2.7 IRWM Objectives - Objective H	2-14	[third paragraph after call out box] or "from being placed on the Clean Water Act 303(d) list" "...and prevent waters that currently meet the standards from slipping into non-attainment."	Revised.
228	9/17/2018	City of Oceanside	2.7 IRWM Objectives - Objective I	2-16	[first paragraph] and local water supply "...an additional benefit of improving water quality, particularly when used..."	"Stormwater captured and used to sustain habitat and support local water supply often achieves dual benefits..."
229	9/17/2018	City of Oceanside	2.7 IRWM Objectives - Objective J	2-16	[third paragraph after call out box] aging sanitary sewer infrastructure, spills and maintenance issues also cause this. If the focus is all water management in this section, include these as well since it prioritizes wastewater mgmt alongside stormwater. "Urban and agriculture stormwater runoff frequently degrades the water quality...resulting in the posting of advisories of potential public health threats..."	Agreed. Revised.
230	9/17/2018	City of Oceanside	2.7 IRWM Objectives - Objective J	2-16	[fourth paragraph after call out box] conservation areas/easements "...restrictions on recreation (limiting public access, limiting certain recreational activities..."	Add conservation areas/easements to the list of things that place restrictions on recreational uses to protect water supply and other beneficial uses.
231	9/17/2018	City of Oceanside	2.11 References	2-32	looks like this TOC page was incorrectly placed at end of section 2.	Yes. This is being removed.
232	9/17/2018	City of Oceanside	Table 3-5: Existing and Projected Land Use within the County (Acres)	3-5	does undeveloped land include preserved open space / protected habitat?	Added clarification.
233	9/17/2018	City of Oceanside	3.3.4 DAC, EDA, and URC Considerations	3-15	[second paragraph] but for project proponents, funding is often contingent upon demonstrating benefits to a DAC/URC etc., correct? so, proponents should try to explain these benefits within the context of the DWR / State definitions. this is especially important for this document as a tool to comply with qualification requirements for IRWM grant funding. "...explain how their community or project area comprises EDA or URCS."	Revised to "...encourages stakeholders and project proponents to explain how their community or project area comprises EDAs or URCS as defined in this 2019 IRWM Plan or in appropriate governmental guidelines."
234	9/17/2018	City of Oceanside	3.3.4 DAC, EDA, and URC Considerations	3-21	[footnote] earlier in section 3.3 the definitions of DACs, EDAs etc are described, but also want to make sure the 2019 criteria are explained. think if there's a purpose to listing CPAs/ cities here that once qualified for DAC areas but in the next phase of the IRWM plan they don't qualify, per DWR's definitions.	Revised footnote to indicate changes are related to shifts in the MHI of the state and local communities over time, but the definition of DAC has not changed. Also added note that EDA and URC definitions are new and only apply to the 2019 IRWM Plan.
235	9/17/2018	City of Oceanside	3.3.4 DAC, EDA, and URC Considerations	3-23	[footnote] same comment as above re: 2019 DAC criteria.	See response to comment #234
239	9/17/2018	City of Oceanside	3.5.4 Wastewater	3-44	[last paragraph] if it fits within the priorities of IRWM, shouldn't septic be included here?	Agreed. Incorporating septic to Section 3.5.4.
240	9/17/2018	City of Oceanside	3.5.7 Conservation	3-64	[first paragraph] citation? "...and will enter waters during the first flush event - the first major storm event following the dry season."	Revised to "Although reduced runoff can contribute to improved water quality..."
241	9/17/2018	City of Oceanside	3.5.8 Stormwater Management	3-65	[third bullet] new development (or if you use PDP, define it here) "...rates and durations from all Priority Development Projects..."	Revised.
242	9/17/2018	City of Oceanside	3.5.8 Stormwater Management	3-65	[second paragraph] this section not current and thus not relevant to the IRWM plan update, focus on the 2013 MS4 permit	Reviewed section and added clarification regarding which permit. Removed 2013 MS4 permit items where possible.
245	9/17/2018	City of Oceanside	Table 3-29: Adopted TMDLs	3-86	Loma Alta Slough is actually subject to an "alternative" to TMDL, using the MS4 permit to achieve WQOs.	Revised.
249	9/17/2018	City of Oceanside	5.3 San Luis Rey Watershed	5-23	[sixth paragraph] flood control section not current. the City of Oceanside routinely mows vegetation from the riverbed under permit from USACE and CDFW; the USACE continues to oversee habitat management and restoration activities in the lower river.	Updated to indicate City's efforts.
250	9/17/2018	City of Oceanside	5.3 San Luis Rey Watershed	5-26	[first paragraph] wasn't Gregory Canyon project postponed or cancelled?	Yes. Gregory Canyon has been removed from this section.
251	9/17/2018	City of Oceanside	5.4 Carlsbad Watershed	5-33	[third paragraph] Carlsbad WQIP accepted in 2016 I think. Update text	Carlsbad WQIP was accepted in 2016, and revised and finalized in 2018. Revised text.
252	9/17/2018	City of Oceanside	5.4 Carlsbad Watershed	5-34	[fifth paragraph] replace WURMP with WQIP	Revised.

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253	9/17/2018	City of Oceanside	8.4.16 Pollution Prevention	8-17	[first paragraph] and also to assign loads/responsibilities to watershed agencies "...purpose of TMDLs is to determine pollutant loads and implement activities..."	Revised.
254	9/17/2018	City of Oceanside	10.3.2 Technical Analysis and Methods	Table 10-3: Technical Analysis and Methods Used in the 2013 IRWM Plan	[comment on pg 10-20] does not look like this table has been updated (e.g. MS4 permit references 2007).	Updated table to reflect both the 2013 and 2019 IRWM Plans
1	9/14/2018	Karin Zirk, Friends of Rose Canyon	2.6 IRWM Goals	2-5	We support all of the IRWMP Goals, and high-level support for Objectives A, B, G, I, and J.	Thanks. No change.
2	9/14/2018	Karin Zirk, Friends of Rose Canyon	N/A	N/A	Rose Creek Watershed has been excluded from list of projects	Follow up with Friends of Rose Canyon regarding getting on the list and encouraging attendance at upcoming Call for Projects related workshops
3	9/14/2018	Karin Zirk, Friends of Rose Canyon	9.2.4 Geographical Integration	9-4	Disappointed that...responsible agencies are ignoring the opportunities for enhancement in the [Rose Creek] watershed - enhancements that will positively impact Mission Bay as Rose Creek is currently the largest source of dry-weather freshwater inflows	Followup meeting with Friends of Rose Canyon to discuss the IRWM Project Selection Process.
6	9/14/2018	Karin Zirk, Friends of Rose Canyon	N/A	N/A	We request being added to the stakeholder email distribution list.	info@saverosecreek.org was added to the SDIRWM stakeholder email list on 9/14/18
8	9/14/2018	Rincon del Diablo	1. Introduction	1-1	Shows part of Orange County, so should include them in area description	The San Diego IRWM Region only includes areas within San Diego County. The portion of the San Juan Watershed within San Diego County is included in the SDIRWM Region. The remaining portion of the San Juan Watershed is in the South Orange County IRWM Region.
11	9/14/2018	Rincon del Diablo	1. Introduction	1-1	"...and the population of these areas is expected to increase by 29% by 2050, to over 4.0 million, according to the San Diego Association of Governments..." - *I@#	No change.
35	9/14/2018	Rincon del Diablo	1.3 Regional Water Management Group	1-12	"The City of San Diego, the Region's largest retail water agency, is involved in water management within six of the Region's eleven watershed." - Why must we say this? We count too I hope.	This section is discussing the RWMG agencies only. No change.
37	9/14/2018	Rincon del Diablo	1.3.1 San Diego County Water Authority	1-12	[SDCWA logo] - New tag line? Like using this logo!	No change.
40	9/14/2018	Rincon del Diablo	1.3.2 City of San Diego	1-13	[Second to last paragraph] "non-potable" in 2nd sentence is redundant	Used "non-potable recycled water" to emphasize the difference between non-potable reuse and potable reuse, which is discussed in following sentence. Leaving as-is.
54	9/14/2018	Rincon del Diablo	2.7 IRWM Objectives	2-5	Where is Table 2-2? Should come before 2-3 and after 2-1.	Table 2-2 is on page 2-20, immediately before Table 2-3.
55	9/14/2018	Rincon del Diablo	Table 2-1: Crosswalk of San Diego IRWM Plan Goals and Objectives	2-6	Objectives B and D - shouldn't these be solid dots across all goals?	These objectives do not directly address all goals, but rather support them. No change.
56	9/14/2018	Rincon del Diablo	Table 2-1: Crosswalk of San Diego IRWM Plan Goals and Objectives	2-6	Objective H "Effectively reduce sources of water-related pollutants and environmental stressors..."	Objective H is further defined on page 2-14, where it explains that the objective is focused on water-related issues. No change.
58	9/14/2018	Rincon del Diablo	Table 2-1: Crosswalk of San Diego IRWM Plan Goals and Objectives	2-6	I know we can't change this but Objective I - land use? What is Objective J?	Per Rincon - does not need to be addressed. No change.
68	9/14/2018	Rincon del Diablo	N/A	2-32	Why is Chapter 2 contents at the end? Why not precede Chapter 2 content?	This was included in error. Page has been removed for Final IRWM Plan - Phase 1
70	9/14/2018	Rincon del Diablo	3.2 Defining Boundaries for the Region - Appropriateness of Region	3-10	This is stated word-for-word in a previous chapter.	No change.
72	9/14/2018	Rincon del Diablo	3.3 Disadvantaged Communities, Economically Distressed Areas, and Underrepresented Communities	3-12	A large number of pages devoted to [Section] 3.3 as compared to many of the other sections in this chapter - why?	The 2016 Guidelines include additional DAC, EDA, URC guidance. Because the San Diego IRWM Plan does not have a separate DAC, EDA, URC, EI chapter, the bulk of that discussion is instead incorporated into Chapter 3 Region Description.
78	9/14/2018	Rincon del Diablo	3.3.3 Underrepresented and Environmental Justice Communities	3-13	Why such a huge focus and write up on DAC/EDA/URC?	See response to Comment #72
89	9/14/2018	Rincon del Diablo	Community Support for DACs, EDAs, URCs, and EJs	3-26	That's [community support] great but why do we specifically break these out?	DWR has an emphasis on DAC engagement (see DAC Involvement program). This section highlights the efforts already in the Region to support and engage DACs. No change.
94	9/14/2018	Rincon del Diablo	3.5 Water Management Systems - Water Supply Outside Water Authority Service Area	3-31	[regarding community well systems outside the Water Authority's service area not being metered for production] If it's outside of their area, how would they know this?	No change.
96	9/14/2018	Rincon del Diablo	Table 3-13: Imported Water Reliance within the Region, 1999-2016	3-33	Would be better to follow page 3-30 as it's referenced on page 3-28.	Table 3-13 is currently located after the discussion of the Water Authority's imported water supplies. While it's referenced earlier in the chapter, moving it earlier would present the information before the reader has the context. No change.
123	9/14/2018	Rincon del Diablo	3.5.9 Flood Management	3-68	101,000 is an odd number [people exposed to flood risk]	This number is consistent with the 2013 IRWM Plan. No change.

#	Date Received	Commenter	Plan Section	Page Number	Comment	Response
139	9/14/2018	Rincon del Diablo	Figure 5-4 San Luis Rey Watershed (Hydrologic Unit)	5-20	San Diego County has 6 bottled water companies, three of which are known to extract water from wells/springs (i.e. Palomar) at an estimated rate of 30 million gallons/year (cumulative). Does this merit being included in this report?	While this is a high water use, it is captured in commercial/industrial uses. No change.
153	9/14/2018	Rincon del Diablo	Table 6-2: San Diego RAC Membership	6-9	Should they [County, City of San Diego, and SDCWA] be included since they are the RWMG?	Yes. The RWMG are also on the RAC.
154	9/14/2018	Rincon del Diablo	<i>Newsletters and Notices</i>	6-17	The member agencies would like to distribute [the information flyer] too	A flyer will be provided at the October RAC meeting and is available upon request.
155	9/14/2018	Rincon del Diablo	6.4.1 Environmental Justice and Disadvantaged Communities	6-23	Seems interesting that 6 pages are devoted to DAC as compared to other aspects of Governance	See response to comment #72
161	9/14/2018	Rincon del Diablo	6.4.1 Native American Tribes	6-29	First sentence "San Diego County features the largest number of Tribes and Reservations of any county in the United States" was previously stated multiple times.	Repeated here for readers who didn't read the entire Plan. No change.
172	9/14/2018	Rincon del Diablo	7.9 Relation to Climate Change Planning	7-40	[list of three climate change impacts closely related to water resource management] Won't the cold get colder? If so, it should say Temperature changes (or great range in temperature variation)	Temperature is projected to increase in the Region; cold spells are not projected to get colder (see Section 3.14 of the IRWM Plan). No change.
184	9/14/2018	Rincon del Diablo	8.4.17 Salt and Salinity Management	8-17	There are loads of environmental uses [regarding loss of beneficial uses due to salinity issues]	No change.
186	9/14/2018	Rincon del Diablo	8.4.27 Other Strategies - Rainfed Agriculture	8-21	Nopales and cactus apples!	No change.
189	9/14/2018	Rincon del Diablo	9.4 IRWM Project Review	9-7	"The IRWM Plan is a living document" was circled, but no comment.	No change.
205	9/14/2018	Rincon del Diablo	11.2.2 Implementation Issues for Priority Projects - Regulatory Requirements	11-13	First half of the paragraph has been stated before [Tribal concerns about CEQA requirement]	Worth reiterating here.
210	9/14/2018	Rincon del Diablo	11.4.1 Plan Financing	11-23	[First bullet, <i>Business as usual</i>] Add "and its member agencies" after "San Diego County Water Authority"	Member agencies pay the Water Authority, but do not directly contribute to the RWMG's costs to maintain the IRWM Program. No change.
211	9/14/2018	Rincon del Diablo	11.4.1 Plan Financing	11-23	[Fourth bullet, <i>Participation fee</i>] We already do [pay a fee] as rate payers.	The participation fee would be a new fee that you pay specifically to participate in IRWM. No change.
218	9/17/2018	City of Oceanside	1.2.4 Existing Planning Environment	1-8	[second paragraph] if possible I'd suggest a graphic or table to link the above narrative of the multitude of planning efforts in the region. something the reader can quickly look to and see how the plans are interrelated by discipline (e.g. the WQIPs fulfill stormwater regulatory requirements, but also can use strategies like habitat restoration to meet objectives - which ties into MSCP, SWRP etc...)	The requested graphic would be extremely complicated. With a limited budget and time to develop such a graphic, the RWMG has elected to focus resources on other changes. No change.
221	9/17/2018	City of Oceanside	1.6 IRWM Plan Development	Table 1-13: Organization of the 2013 IRWM Plan	curious, but is there a reason the current plan did not simply use the mandated sections provided by the Guidelines, was this a product of the RAC? will this affect plan acceptance/review by DWR?	We will submit to DWR the Plan Standards Review form in which we document where we've addressed each standard. The outline we use in the Plan aligns with how our Region thinks about these topics.
238	9/17/2018	City of Oceanside	3.5.1 Water Authority Supplies	Figure 3-6: Conveyance Facilities for Carlsbad Desalination Project	unnecessary and cluttered figure to present here.	Figure shows how the Carlsbad Desalination Plant connects to the regional water system. No change.
243	9/17/2018	City of Oceanside	3.5.8 Stormwater Management	3-66	[photo] this appears to be a photo of Loma Alta Slough in Oceanside, not Santa Margarita	The photo was provided by the Project Manager. It looks similar to Loma Alta Slough but has an additional structure to the left of the photo that doesn't exist at Loma Alta Slough
244	9/17/2018	City of Oceanside	3.7.2 Surface Water Quality	3-83	[call out box] well said	Thanks. No change.
246	9/17/2018	City of Oceanside	3.8 Environmental Resources	3-99	section heading highlighted	No change.

