

Appendix 6-D: Formal Comment Letters and Stakeholder Comments on 2013 Draft IRWM Plan





July 22, 2013

Rosalyn Prickett
RMC Water
10509 Vista Sorrento Parkway, Suite 205
San Diego, CA 92121

Sent via email to sdirwm@rmcwater.com

Re: Draft 2013 San Diego Integrated Regional Water Management Plan

Dear Ms. Prickett:

On behalf of the Metropolitan Wastewater Joint Powers Authority (JPA) Technical Advisory Committee (TAC), thank you for the opportunity to review the draft 2013 San Diego Integrated Regional Water Management (IRWM) Plan.

The Metro Wastewater JPA is a coalition of municipalities and special districts in the southern and central portions of San Diego County that share in the use of the City of San Diego's regional wastewater collection and treatment facilities. The JPA member agencies include the cities of Chula Vista, Coronado, Del Mar, El Cajon, Imperial Beach, La Mesa, National City and Poway; the Lemon Grove Sanitation District; the Padre Dam Municipal and Otay Water Districts; and the County of San Diego on behalf of County Sanitation Districts. Within the last year, the IRWM Regional Advisory Committee (RAC) added a representative seat for the Metro Wastewater JPA, which is appreciated.

The Metro TAC would like to see the 2013 IRWM Plan expand the discussion on the opportunity for wastewater reuse in the region and how it fits within the region's water management strategy. We believe that the recent success of the City of San Diego's Advanced Water Purification demonstration project and associated progress on the legislative front, establish wastewater reuse as a critical component of the region's future water supply. While the draft document includes recycled water as a strategy, as well as a few references to the City of San Diego's demonstration project, the TAC believes the discussion on this topic and how it fits within the region's integrated approach to water management must be expanded. This is especially important considering that the allocation of future IRWM funds will be tied to the areas advanced in the 2013 IRWM Plan.

Acknowledging that the draft IRWM Plan is built on the 2010 Urban Water Management Plans for water suppliers in the region, the topic of water reuse and the potential for advanced water purification to play a significant role in the region's water supply for the future has gained tremendous traction in the two years since the 2010 Urban Water Management Plans were due to the Department of Water Resources in July 2011.

Expanded water reuse, which would include recycled water and advanced water purification/potable reuse, offers multiple benefits closely related to the goals of the IRWM program. The Point Loma Water

Rosalyn Prickett
Draft 2013 San Diego Integrated Regional Water Management Plan
July 22, 2013

Treatment Plant (PLWTP), operational since 1963, treats approximately 175 million gallons of wastewater per day generated in a 450-square-mile area by more than 2.2 million residents. Remaining effluent is discharged into the Pacific Ocean through the 4.5 mile Point Loma Ocean Outfall, which is 320 feet below surface. While there is a second ocean outfall located in South Bay to serve the southern portion of the County, the PLWTP and Ocean Outfall handle a greater volume of wastewater flow.

The attached white paper explains current issues and opportunities pertaining to the future of the PLWTP and the manner in which an investment in expanded water reuse would help diversify the region's water supply, achieve environmental objectives for the PLWTP, and most effectively spend ratepayer dollars.

Section 8.4.10 of the draft plan, which includes an overview of recycled municipal wastewater as a regional water management strategy, seems like the most appropriate place to incorporate a more in-depth discussion on how expanded water reuse/advanced water purification (in addition to traditional recycled wastewater for irrigation) fits within the regional water supply portfolio and offers multiple benefits closely connected with the goals of integrated water management.

Thank you for the concerted effort to solicit stakeholder feedback on the draft 2013 San Diego IRWM Plan. Please let me know if our organization can be of assistance in developing a more in-depth discussion on an expanded water reuse/advanced water purification section for the IRWM Plan.

Sincerely,



Greg Humora
Chair, Metropolitan Wastewater JPA Technical Advisory Committee
Public Works Director, City of La Mesa

Enclosure

C: Metropolitan Wastewater JPA Technical Advisory Committee
Bob Kennedy, Otay Municipal Water District/Metro Wastewater JPA IRWM RAC Representative
Sheri McPherson, County of San Diego
Cathy Pieroni, City of San Diego
Mark Stadler, San Diego County Water Authority

WATER REUSE AS A STRATEGY TO SECURE SECONDARY EQUIVALENCY AT POINT LOMA WASTEWATER TREATMENT PLANT

EXECUTIVE SUMMARY

The Point Loma Wastewater Treatment Plant (PLWTP) is operated by the City of San Diego and currently serves the City of San Diego and 12 member agencies throughout the County.

PLWTP is permitted to treat up to 240 million gallons of wastewater a day and has operated at levels greater than 180 mgd while meeting or exceeding all general and specifically negotiated regulatory requirements necessary to maintain a permit waiver thereby allowing it to remain as a smaller advanced primary treatment plant.

Members of the Metropolitan Wastewater Joint Powers Authority (JPA) believe that permanent acceptance of a smaller PLWTP as an advanced primary treatment plant can be achieved through development and implementation of a comprehensive, systematic Regional Water Reuse Plan. This Plan must increase public awareness, further catalyze customer action through individual water conservation and water reuse; consider opportunities for storm water capture, and the use of gray water and rainwater; expand recycled water opportunities; and implement a variety of agency-specific and collaborative large-scale potable water reuse projects including Indirect Potable Reuse (IPR) resulting in a significant off-loading of the treatment demand on PLWTP.

A successful effort would secure state and federal legislation accepting secondary equivalency at a smaller PLWTP making future permit waiver processes unnecessary and avoiding, on behalf of our ratepayers, not only the estimated \$3.5 billion dollar capital/financing expense of upgrading PLWTP to secondary treatment (not to mention millions of dollars in annual operating costs), but perhaps also alleviating potable water demands to such a degree as to allow a smaller Sacramento delta option and fewer desalination projects (avoiding additional billions of dollars in capital, operating, and energy costs, as well as carbon generation).

THE CASE FOR SECONDARY EQUIVALENCY AT POINT LOMA

City of San Diego Water and Wastewater Utilities

The current practice of the City of San Diego ("the City") is to procure raw water, treat it to drinking water standards and distribute it throughout the City. The City also collects and treats wastewater for its residents and businesses and for a number of other agencies and discharges treated wastewater to the ocean. These participating agencies make up about 35% of the flow in the system and are represented by the Metro Wastewater Joint Powers Authority ("JPA") which is comprised of the County of San Diego and the surrounding cities of Chula Vista, Lemon Grove, El Cajon, Coronado, Del Mar, Imperial Beach, La Mesa, National City, and Poway, and the Otay and Padre Dam Water Districts. The City wastewater system also produces reclaimed water for use in

irrigation and industrial purposes, and distributes through its own separate piping system (purple pipe).

The City's wastewater system consists of the following Municipal and Metropolitan wastewater infrastructure: a Municipal wastewater system of pipelines and pump stations which collects and sends wastewater to the Metropolitan (Metro) wastewater system for treatment and discharge to the ocean. The Metro system consists of

- several large pipelines and pump stations,
- three treatment plants,
- a biosolids (sludge) processing plant (the Metro Biosolids Center) and
- two ocean outfalls.

The Point Loma Wastewater Treatment Plant (PLWTP) is permitted as a 240 million gallons per day (mgd) advanced primary (chemically enhanced) plant which discharges treated wastewater through the Point Loma Ocean Outfall (PLOO) 4.5 miles out in the ocean in 320 feet of water.

The North City Water Reclamation Plant (NCWRP) is a 30 mgd tertiary treatment plant which produces reclaimed water. Since the NCWRP does not have its own outfall, wastewater not needed for reclaimed water customers is treated to a secondary level and pumped to the PLWTP.

The South Bay Water Reclamation Plant (SBWRP) is a 15 mgd tertiary treatment plant which produces reclaimed water. Wastewater not needed for reclaimed water customers is treated to a secondary level and discharged through the South Bay Ocean Outfall (SBOO).

Wastewater Treatment

Wastewater treatment is basically the process of removing solids from the wastewater. All treatment plant processes typically begin with screens to remove debris such as pieces of wood, followed by removal of grit (mainly sand).

A Primary treatment plant then removes solids which are heavy enough to settle out of the wastewater by gravity.

Advanced Primary treatment plants such as the PLWTP then use chemicals to cause lighter solids to clump together and settle out by gravity.

A Secondary treatment plant has a primary level of solids removal followed by a biological treatment which removes lighter biological matter in the wastewater.

A Tertiary treatment plant like the NCWRP and the SBWRP has both Primary and Secondary treatment followed by filtration such as through anthracite coals beds. The required levels of treatment are typically measured by Total Suspended Solids (TSS) and Biological Oxygen Demand (BOD). The BOD is a measure of how much dissolved oxygen the treated wastewater might remove from the receiving water, such as the ocean.

Wastewater Treatment Regulation

The federal Clean Water Act passed in 1972 required that all wastewater treatment plants be permitted every five years. The permitting process in California involves the Environmental Protection Agency (EPA), the local Regional Water Quality Control Board

(RWQCB), the State Water Resources Control Board and the California Coastal Commission (CCC).

The Clean Water Act also required wastewater treatment plants to treat wastewater at least at a secondary level. The actual required treatment is based on what is needed to protect the receiving waters, such as lakes, rivers and the ocean. A number of dischargers are required to go to higher levels of treatment than secondary.

Several years after the Clean Water Act was enacted, it was amended to allow dischargers to receive a modified permit (waiver of secondary) if dischargers could demonstrate they could safely discharge wastewater to the receiving water at a treatment level lower than secondary such as Advanced Primary. In practice, permits were based on what was actually needed to protect the receiving waters--secondary in many cases, above secondary in other cases and below secondary in some cases.

Initially, the City of San Diego applied for a modified permit for the PLWTP but later withdrew the application and began planning to convert the PLWTP to secondary. Subsequently the window of time in the Clean Water Act for applying for a modified permit closed, and the EPA and several environmental groups sued the City for not being at secondary at the PLWTP. In 1994, the federal Ocean Pollution Reduction Act (OPRA) was passed. OPRA was sponsored by then-Congressman Filner and provided an opportunity for the City to apply for a modified permit for the PLWTP. In return, the City agreed to construct 45 mgd of reclaimed water capacity. This resulted in the construction of the NCWRP, the SBWRP and the SBOO. The City applied for and was granted a modified permit for the PLWTP in 1994.

Point Loma Wastewater Treatment Plant Permits

The City must apply for a new permit or modified permit every five years for the PLWTP. In order to gain support from the local environmental community for the modified permit sought every five years, the City has agreed to do a number of studies. Each study was reviewed by environmental groups and their experts.

The City conducted a refined estimate of costs to convert the PLWTP to secondary. The PLWTP is hemmed in by the Navy, the Cabrillo National Monument, the ocean and a cliff. This leads to higher costs for the addition of secondary treatment. The initial study indicated a capital cost of \$1 billion which has recently been escalated to \$1.4 billion in today's dollars, not including financing costs. In addition, secondary treatment requires a great deal of electricity. Operating costs were initially estimated at \$40 million annually.

The City also conducted a comprehensive review of its Ocean Monitoring Program. In order to apply for a permit, dischargers must demonstrate the effect of their discharge on the receiving water. The City continuously collects data from the ocean near the discharge point of the outfall, measuring impacts on sediments, water quality, and aquatic and plant life. The City hired experts from well-known scientific organizations such as Scripps and Woods Hole to review the Ocean Monitoring Program and provide recommendations to make it more comprehensive. All the recommendations were implemented.

The City also agreed to conduct studies and projects to optimize wastewater reuse, although it was already producing reclaimed water at the NCWRP and the SBWRP. The

Recycled Water Study looked at the feasibility of expanding recycled water use and producing potable water from wastewater. The Recycled Water Study concluded that since most of the recycled water uses in the area were seasonal irrigation requiring separate pipelines from the existing water system, increasing wastewater reuse would be more productive through pursuing potable reuse.

Potable Reuse can be either Indirect or Direct Potable Reuse.

- Indirect Potable Reuse (IPR) includes advanced treatment of wastewater followed by discharge to, for example, a drinking water reservoir and then to a water treatment plant.
- Direct Potable Reuse (DPR) sends advanced treated wastewater directly to a water treatment plant.

The Recycled Water Study outlined a concept whereby almost 100 mgd of wastewater otherwise planned to be treated at the PLWTP could be diverted upstream of the PLWTP to either Advanced Water Treatment Facilities (IPR) or to South Bay wastewater treatment plants. This would allow the permitted capacity of the PLWTP to be reduced from 240 mgd to 143 mgd.

The City then looked at the feasibility of treating wastewater to a potable level. A one mgd demonstration project was conducted at the NCWRP and a study was made of San Vicente Reservoir. The study and demonstration project showed that wastewater could be treated at the NCWRP to a level sufficient for safe discharge to San Vicente Reservoir for subsequent treatment at a water treatment plant. The process would be Indirect Potable Reuse (IPR). Water produced at the demonstration site was almost the same quality as distilled water.

The current modified permit for the PLWTP expires on July 31, 2015. The application for a new permit must be submitted no later than January 2015. It takes approximately one year to collect and assemble the data required for the permit application. That process is expected to start in January 2014.

THE CASE FOR POTABLE REUSE AS A STRATEGY

Potable Reuse/Secondary Equivalency Program Concept

The San Diego region is semi-arid and needs the most cost effective and diverse system of water supply it can achieve. Potable water reuse of wastewater, either Indirect or Direct, appears to be a competitive choice in producing a new water supply. The region also needs a wastewater treatment system that protects the ocean environment.

The capital and operating costs of providing additional water for the region will have a significant impact on water ratepayers. In addition, if the City was ever required to convert the PLWTP to secondary, the capital and operating costs would likewise be significant to the wastewater ratepayers. In almost every case, water and wastewater ratepayers are the same people. By considering combined water supply and wastewater treatment needs, there is an opportunity to reduce the impact to ratepayers by billions of dollars in capital and financing costs, and tens of millions of dollars in annual operating and energy costs. An additional benefit would be a reduction in environmental impacts because much less energy production would be needed.

The Recycled Water Study outlines a concept whereby almost 100 mgd of actual and planned wastewater flow is diverted upstream from the PLWTP to either potable reuse or to South Bay wastewater treatment plants. This concept includes 83 mgd of Advanced Water Treatment (IPR) and could reduce the permitted capacity of the PLWTP from 240 mgd to 143 mgd. The environmental impact of a 143 mgd Advanced Primary Plant at Point Loma would be similar to or less than the impact of a 240 mgd Secondary Plant (Secondary Equivalency).

Since the historic flows through the PLWTP have exceeded 180 mgd and the comprehensive Ocean Monitoring Program has shown no detrimental impact to the ocean environment, there would be no value in converting the remaining flow at the PLWTP (say 143 mgd) to secondary. Even converting 143 mgd of capacity at the PLWTP would result in hundreds of millions in capital costs, tens of millions in annual operating costs and the environmental impacts of producing the energy to operate the secondary plant.

Rather than planning for one wastewater or water project at a time, the region's needs for wastewater treatment and additional water supply should be planned programmatically together over a longer period of time. Conceptually, almost 100 mgd of potable reuse and diversion of wastewater to South Bay could be implemented over a specific timeframe and combined with lowering the permitted capacity of the PLWTP to 143 mgd, for example. In return, action would be taken to allow the PLWTP at the lower capacity to remain at Advanced Primary treatment. The PLWTP would still be required to get a new permit every five years and demonstrate through the City's comprehensive monitoring program that it was not harming the ocean environment.

CONCLUSION

As representatives of our region's ratepayers, we are at a critical juncture. The choices we make as a result of actions we take or, perhaps, opportunities missed due to our inaction, will have environmental and fiscal ramifications for many generations to come.

The Metropolitan Wastewater JPA supports the development of a Regional Water Reuse Plan so that both new, local, diversified water supply including potable reuse is created and maximum offload at Point Loma is achieved to support state and federal legislation accepting a smaller PLWTP as a secondary equivalent.

Success ultimately minimizes wastewater treatment costs and lessens the need for new water supply sources due to expanded water reuse thereby most effectively applying ratepayer dollars.

Metro JPA Goal: Create a regional water reuse plan so that both a new, local, diversified water supply is created AND maximum offload at Point Loma is achieved to support legislation for permanent acceptance of Point Loma as a smaller advanced primary plant. Minimize ultimate Point Loma treatment costs and most effectively spend ratepayer dollars through successful coordination between water and wastewater agencies.



July 31, 2013

Via e-mail to sdirwm@rcmwater.com

Rosalyn Prickett
RMC Water
10509 Vista Sorrento Parkway, Suite 205
Sacramento, CA 94249-0078

RE: Draft 2013 San Diego Integrated Regional Water Management Plan

Dear Ms. Prickett:

San Diego Coastkeeper and Surfrider Foundation, San Diego Chapter appreciate this opportunity to provide comments on the San Diego Integrated Regional Water Management Plan.

San Diego Coastkeeper and Surfrider Foundation, San Diego Chapter have been working closely with the Metro Wastewater JPA and with the City of San Diego Public Utilities Department to increase wastewater recycling in San Diego. We all agree that this work could benefit from a regional approach to reduce wastewater discharges from the Point Loma sewage treatment facility and to create a local drinking water supply.

We join the Metro Wastewater JPA in asking to see the 2013 IRWM Plan expand the discussion on the opportunity for wastewater reuse in the region and how it fits within the region's water management strategy. We agree with the Metro Wastewater JPA that the success of the City of San Diego's Advanced Water Purification demonstration project and legislative progress establish wastewater reuse as a critical component of the region's future water supply. Expanding the discussion of wastewater reuse is particularly important given that the allocation of future IRWM funds will be tied to the areas advanced in the 2013 IRWM Plan.

We agree with the Metro Wastewater JPA that Section 8.4.10 of the draft plan should be broadened to include a more in-depth discussion of how expanded water reuse/advanced water purification for potable reuse fits within the regional water supply portfolio and offers multiple benefits closely connected with the goals of integrated water management. Further, the description of the City of San Diego's Advanced Water Purification demonstration project on page 8-11 should be updated to reflect the latest results. The 2009 summary currently included in the draft fails to recognize the project's overwhelming success and the implications for potable reuse in the region. The final project reports can be found at <http://www.sandiego.gov/water/waterreuse/demo/projectreports/index.shtml>

Thank you in advance for your consideration and incorporation of these comments. We look forward to continuing to be actively engaged in the IRWM planning process.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jill M. Witkowski'.

Jill M. Witkowski
San Diego Coastkeeper
Waterkeeper

A handwritten signature in blue ink, appearing to read 'Julia Chunn-Heer'.

Julia Chunn-Heer
Surfrider Foundation, San Diego Chapter
Campaign Coordinator



July 31, 2013

Draft 2013 IRWM Plan
c/ o Rosalyn Prickett, RMC WATER OR
Mark Stadler, IRWM Program Manager
RMC Water and Environment
10509 Vista Sorrento Pkwy, Suite 205
San Diego, CA 92121

COMMENTS SUBMITTED VIA EMAIL: (SDIRWM@RMCWATER.COM)

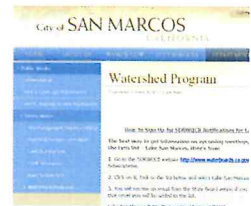
RE: City of San Marcos - Comments on Draft 2013 IRWM Plan

Dear Ms. Prickett/Mr. Stadler:

Thank you for the opportunity to comment on the **Draft**. The City of San Marcos has participated in several workshops with regards to the **Draft 2013 IRWM Plan**. A general comment is that comments provided during those workshops have still not yet been incorporated into the **Draft 2013 IRWM Plan** including Key Projects also listed by SDRWQCB staff present at those workshops.

The City of San Marcos officially requests that these projects and other comments be formally included in the Final **2013 IRWM Plan**:

- Ongoing Efforts of Regional Importance in the Upper San Marcos Watershed (Upper San Marcos Creek/Lake San Marcos Nutrient Voluntary Stakeholder TMDL and USMC Nutrient Management Plan <http://www.ci.san-marcos.ca.us>)
- San Marcos Creek District Specific Plan/ SR 78 Corridor and 401 Permit/ Master WQTR <http://www.ci.san-marcos.ca.us>;
- Adopted 2012 General Plan Update/Final EIR (<http://www.ourcityyourfuture.com> OR <http://www.ci.san-marcos.ca.us> – General Plan Button on City Web Site); and
- Draft Climate Action Plan <http://www.ci.san-marcos.ca.us> – Climate Action Plan Button on City Web Site)
- City of San Marcos DAC Community GIS data file and map (sent separately via e-mail)



In addition, we have recently participated in the July 17, 2013 workshop as well as have reviewed the and have additional specific comments related to **Draft 2013 IRWM Plan**:

- Disadvantaged Communities (please find attached PDF Map of DAC communities in San Marcos that Meet the DWR Criteria and a separate e-mail of GIS Data for this mapping)
- FEMA Hot Spots
- Habitat and Water Quality/Hydromodification Mitigation and Management Planning



- Carlsbad Watershed Section 5.4 – See comments in attached PDF sent in a separate e-mail
- Order R9 2013 -0001 – Watershed Management Analyses (WMA) for Land Development
- The SDRWQCB Basin Plan Triennial Review
- City of San Marcos Channel Maintenance Permit(<http://www.ci.san-marcos.ca.us/index.aspx?page=325>)
- Phase II Permits
- Trash TMDL – SWRCB

Should you have any questions or need to forward any correspondence please contact myself , Erica Ryan or Susan Vandrew Rodriguez at 760-744-1050, at svandrew@san-marcos.net.

Sincerely,

Garth Koller
Principal Planner
gkoller@san-marcos.net

cc: Jerry Backhoff, Planning Director
Mike Edwards, Public Works Director/City Engineer
Maryam Babaki, PE Deputy City Engineer
Jim Chafe, Deputy Director of Public Works
Erica Ryan, Stormwater Program Manager
Susan Vandrew- Rodriguez, Associate Planner
Denise Curl, Management Analyst



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July 30, 2013

Mark Stadler
IRWM Program Manager
4677 Overland Ave.
San Diego, CA 92123
sdirwm@rmcwater.com

Re: Comment Letter for San Diego IRWM Plan

Dear Mr. Stadler,

The Pala Band of Mission Indians ("PBMI") appreciates the opportunity to comment on the San Diego Integrated Regional Water Management Plan ("IRWM Plan"). We believe that the concept and goals of the IRWM Plan are laudable, and we appreciate that a concerted effort has been made by the IRWM planning staff to bring tribes into this process. In particular, we appreciate the attention that was paid to our previous comment letter, which was sent to Rosalyn Prickett on May 31, 2013. Below are our comments on Chapter 4, Tribal Nations of San Diego County; and Chapter 5, Section 5.3, San Luis Rey Watershed.

Rather than create an exhaustive list of minor issues, we have included with this letter a marked-up copy of specific pages from chapters 4 and 5 with several minor typos and stylistic errors identified and corrected. Our more substantive remarks are noted with "See letter" and include the suggestions noted below.

Chapter 4, Tribal Nations of San Diego County

Section 4.5, Development on Tribal Lands

The final paragraph on page 4-7 includes a sentence referencing the Winters Doctrine and proposing that tribes are now relying on previously unused water rights. Tribes have been using their water rights for decades, and not just recently in response to new economic developments. It may be more accurate to rephrase this sentence to read "unclaimed" or "undocumented by the County Water Authority" rather than "unused."

On page 4-8, the list of water protections measures should include the following:

- Maximizing water conservation by:
 - Using native, drought-resistant plants in landscaping
 - Using proper irrigation timing and duration
 - Implementing indoor water conservation practices in kitchens

- Managing water quality by:
 - Tribal environmental departments' water quality programs

Section 4.7.3, Water Management Issues

We recommend making the following changes to some of the numbered summary items in this section:

- 3. This item should include a line acknowledging tribes' superior water rights and recommending some off-reservation regulation of groundwater pumping.
- 13 & 14. Add the need for additional flood warning monitoring and data gaps in the early warning flood monitoring program.
- 15. Tribal lands often get allocated as assumed wildlife corridors and/or natural spaces that will not be developed in the County's Multiple Species Conservation Program without any consultation with the tribe or acknowledgement of tribal development plans. It might be useful to add this issue to this summary item.

Although we mentioned our concerns regarding the CEQA process for tribes as detailed in the IRWM Plan, it is unclear whether any steps are being taken to take up this issue at the state level. Section 4.7.3, Water Management Issues, does indicate that the CEQA requirement is a significant barrier to funding and tribal participation. We recommend that the following be added to the final sentence of the penultimate paragraph on page 4-22: *"Any attempt to apply CEQA requirements to tribes is a significant barrier to funding and tribal participation in IRWM programs, since it requires tribes to give up their tribal sovereignty in order to use state funding for a project on tribal land."*

Chapter 5.3 – San Luis Rey Watershed

Water Systems

We think it is important to mention both tribal public water systems and their wastewater agencies alongside the larger agencies already mentioned. These public water systems may not be as large as some of the ones mentioned; however, it is important to include them since we may all be project partners in the near future. Additionally, most of the San Luis Rey Tribes have groundwater wells that serve their public water systems, and they should be mentioned in the last paragraph of this section as well.

Internal Boundaries and Land Uses

It would be useful to calculate the percentage of land that lies within Tribal Reservations and provide that information in this section.

Management Issues and Conflicts

Issues from the central portion of the watershed (where most tribes are located) have not been adequately addressed in this section. There is a large potential for groundwater overdraft since the County's General Plan does not typically take into account Tribal development or the senior water rights of local Tribes. These plans usually only account for non-tribal development that is in the planning

stages and therefore over-allocate local groundwater resources. It would be helpful to mention this challenge and bring attention to it. Additional challenges include the reduction of surface water due to water diversion, as well as an increase in the use of groundwater from increased agricultural and residential development.

We thank the IRWM Plan staff for careful consideration of these comments. We look forward to continuing to work with you.

Sincerely,

A handwritten signature in black ink, appearing to read "Shasta Gaughen", with a stylized flourish at the end.

Shasta C. Gaughen, PhD
Environmental Director
sgaughen@palatribe.com

CC: Rosalyn Prickett (via e-mail)
Robert Smith, Chairman, PBMI
Heidi Brow, Water Quality Specialist, PBMI



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July 19, 2013

Ms. Rosalyn Prickett
San Diego IRWM Plan Preparation Team
RMC Water and Environment

Via e-mail: sdirwm@rmcwater.com

Subject: Comments on June 2013 Draft San Diego Integrated Regional Water Master Plan

Dear Ms. Prickett:

The Vista Irrigation District appreciates the opportunity to review the June 2013 Draft of the San Diego IRWM Plan, and offers the following comments on both the “Highlights” document as well as selected portions of the entire draft plan. We have focused our efforts in those areas where the District has the most knowledge and interest, and have organized our comments into what we believe to be factual errors or just editorial preference.

Factual Errors

1. Page 3-1, second sentence in second to last paragraph: “Caucasians represent the only ethnic group for which a population decrease is forecasted”. Per table 3-1, the population of Caucasians is actually expected to increase, but because the population of other ethnicities increases at a faster rate, the percentage of the population represented by Caucasians decreases over time.
2. Page 3-4, last sentence of first paragraph: “Less than 10% of the adult population did not graduate from high school.” Per Table 3-3, this should read “Less than 15%...”, or replace “graduate from” with “attend”.
3. Page 3-28, Table 3-13: Principal Storage Water Reservoirs. Olivenhain and San Dieguito Reservoirs are listed in the San Dieguito Watershed, but are physically located in the Carlsbad Watershed. Lake Henshaw’s capacity is listed at 51,744 acre-feet; the capacity should be listed as 51,774 acre-feet.
4. Page 3-29, Table 3-14: Potable Water Treatment Facilities. In footnote 4, only Lake Henshaw is in the San Luis Rey River Watershed; both Lakes Wohlford and Dixon (the later which is not mentioned but is the principle source of supply for Escondido/Vista WTP) are in the Carlsbad Watershed. Also, in footnote 5, Lake Hodges is incorrectly identified as being in the San Diego River Watershed; it should read the San Dieguito River Watershed. Finally, footnote 5 describes both Badger and McCollom WTP’s; while both receive local water from Lake Hodges, Badger

also treats water from the San Dieguito Reservoir, while McCollum treats water from Olivenhain Reservoir, both of which are in the Carlsbad Watershed.

5. Page 3-43, listing of major groundwater production sources at bottom of page. For the 30 years ending 2012, the Vista Irrigation District has pumped an average of 7,680 afy of groundwater out of the Warner Basin into Lake Henshaw. This may not be reflected in Water Authority records, because, for the purposes of the California Department of Public Health, this source is treated as a surface water source.
6. Page 3-48, last sentence of second paragraph. "Valley Irrigation District" should read "Vista Irrigation District".
7. Page 4-15, second to last sentence in first paragraph: "Lake Wohlford is a storage reservoir for Vista Irrigation District." Should read "...a storage reservoir for the City of Escondido."
8. Page 5-20, third line from bottom of page: SLR drainage area mistakenly reported as 1168 sq. miles; in other places it is (accurately, I believe) reported as 558 sq. miles. Also, the reported 100 year peak discharge rates are suspicious: 22,911 cfs for Keys Creek (31.6 sq. mi drainage) but only 560 cfs for the San Luis Rey River (558 sq. mile drainage), which presumably receives the Keys Creek flood event.
9. Page 5-37, "Water Systems" description of the San Dieguito Watershed. Olivenhain and San Dieguito Reservoirs are incorrectly listed as part of the San Dieguito Watershed – they are physically located in (and drain to) the Carlsbad Watershed. See suggestions under "Editorial Preference" for pages 5-28 and -29, below.
10. Page 7-6, Table 7-3: Summary of San Diego Region Water Supply Plans. It appears that footnote 5, which appears next to every water agency except for Sweetwater, is incorrect. As written, it would only apply to Sweetwater. It appears that the correct footnote 5 was omitted and the current footnote 5 should be footnote 6.

Editorial Preference

11. "Highlights" Page 1, 4th bullet: replace "Negligible" groundwater supplies with "Sparse" or "Scarce" groundwater supplies. Groundwater is treated as an important element of the region's water supply portfolio in numerous citations throughout the document, including Objective E (pg. 5). Used conjunctively with surface water, groundwater is a significant source of supply for Lake Henshaw, which in turn provides a significant portion (roughly 20%) of the water supply for the City of Escondido and the Vista Irrigation District. For us, and for the region as a whole, groundwater is not a negligible source of supply.
12. "Highlights" Page 6, last sentence of second paragraph: insert "generally" to read: "Groundwater generally occurs in formations that..."
13. Page 1-1, 2nd bullet: same comment as 11 above – replace "negligible" with "scarce".

Ms. Rosalyn Prickett

July 19, 2013

Page 3 of 3

14. Page 3-4, Table 3-5: Existing and Projected Housing. Footnote 2 appears in the “2008” column, but appears to address data presented in the “2030” column; suggest revising.
15. Page 3-5, Figure 3-2: Land Use. Suggest modifying title or adding footnote to specify the year represented by the figure.
16. Page 3-6, text and Table 3-6: Existing and Projected Land Use within the County. I realize this is not the thrust of this report, but observe that the first sentence on the page says that “No significant net decrease is projected in the acreage of San Diego County lands zoned for agricultural use”, yet the Land Use “Other” in Table 3-6 (which includes water, road ROW, agriculture and military) shows a 40% decrease. Also, the total acreage of all land use types decreases from 3.11 to 2.86 million acres in the period 2008 to 2050.
17. Page 3-27, Figure 3-5: Regional Water Supply Infrastructure. The location of the McCollum Water Treatment Plant (OMWD) is shown on the figure, but unlabelled.
18. Page 3-29, Table 3-14: Potable Water Treatment Facilities. While the table indicates both the Badger and Escondido/Vista Water Treatment Plants are connected to the aqueduct, footnotes 4 and 5 are inconsistent. Footnote 4, which is attributable to the Escondido/Vista Water Treatment Plant, does not mention access to imported water, while footnote 5 (for Badger and McCollom) does.
19. Page 4-7, third line from bottom of page: missing period after "reservation lands".
20. Page 5-18, Figure: San Luis Rey Watershed. The purple highlight for “Impaired Water Bodies (303(d) List)” does not reflect the Keys Creek and San Luis Rey River (upper) listings described under “Water Quality” on page 5-20.
21. Pages 5-28 and -29. Suggest adding Olivenhain Reservoir to the map of the Carlsbad Watershed, and listing both Olivenhain and San Dieguito Reservoirs in the bullet list of “Major Surface Water Bodies” in the Hydrology section on page 5-29. Also, there is an inconsistency in where reservoirs are listed in watershed descriptions. Sometimes they appear under “Hydrology” (as in the Carlsbad Watershed), sometimes under “Water Systems” (as in the San Dieguito Watershed).

The entire San Diego IRWM Plan Preparation Team is to be congratulated on preparing such comprehensive view of the region’s water management issues. We also recognize that not all our comments merit the time or effort to address. If you have any questions regarding these comments, please do not hesitate to contact me at (760) 597-3168.

Very truly yours,



Don A. Smith
Director of Water Resources



Michael R. Welch, Ph.D., P.E.

CONSULTING ENGINEER

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July 31, 2013

Ms. Rosalyn Prickett, AICP
Project Manager
RMC Water and Environmental
10509 Vista Sorrento Parkway, Suite 205
San Diego, CA 92121

Dear Ms. Prickett:

Subject: Comments on Draft 2013 IRWM Plan
Draft Regulatory Work Group Report

Subsequent to issuance of the Draft Regulatory Work Group Report (Appendix 7-A of the draft 2013 IRWM Plan Update), I have had an opportunity to informally discuss Regulatory Work Group recommendations with a number of the Regulatory Work Group members, including Regional Board staff. The essence of the comments I have verbally received is that the draft Regulatory Work Group report should more clearly emphasize that:

1. The Regional Board encourages stakeholder participation in their Basin Plan and 303(d) review processes and has implemented processes to solicit stakeholder input in each.
2. IRWM coordination with the Regional Board relative to Basin Plan assessment and modification should include organized IRWM stakeholder participation in the upcoming Regional Board triennial review process for identifying and prioritizing potential Basin Plan amendments.
3. IRWM coordination with the Regional Board relative to 303(d) impaired water listings should include organized IRWM stakeholder participation in the upcoming Regional Board stakeholder advisory process for identifying 303(d) listing issues.

These recommendations were captured within Section 5 of the draft 2013 IRWM Plan Update, which was prepared subsequent to the receipt of the above comments but after preparation of the draft Regulatory Work Group Report. I have attached proposed revisions to the Regulatory Work Group Report (see attached) which (1) more clearly emphasize the above recommendations and (2) make the Work Group Report consistent with Section 5 of the IRWM Plan Update. It is recommended that the attached revisions be incorporated into the final version of the Regulatory Work Group Report.

Please contact me if you have any questions.

Sincerely,

Michael R. Welch, Ph.D., P.E.
CONSULTING ENGINEER



CALIFORNIA TROUT

July 31, 2013

VIA EMAIL

Rosalyn Prickett
Project Manager
RMC Water Management
10590 Vista Sorrento Parkway
Suite 205
San Diego, CA 92121

Re: Draft 2013 San Diego Integrated Regional Water Management Plan

Dear Ms. Prickett:

California Trout (CalTrout) and Trout Unlimited have reviewed and appreciate the opportunity to comment on the Draft 2013 San Diego Integrated Regional Water Management Plan (Plan). By way of background, CalTrout and Trout Unlimited are non-profit corporations committed to the protection and restoration of steelhead and their waters throughout California including San Diego County. Further, CalTrout and Trout Unlimited are Co-chairs of the South Coast Steelhead Coalition (Coalition), whose other members or participants include California and federal resource agencies and San Diego-based environmental, non-profits. The California Department of Fish & Wildlife's Fisheries Restoration Grant Program funds the Coalition's activities, which include identifying, prioritizing and implementing habitat restoration projects for steelhead throughout San Diego County. CalTrout and Trout Unlimited look forward to working with the Regional Water Management Group (RWMG) and its consultants and other stakeholders to advance the Plan's Third Goal: "Protect and Enhance our Watersheds and Natural Resources." Towards that end, CalTrout and Trout Unlimited request that the RWMG and its consultants address the following comments in the final version of the Plan.

The Actual Range of the Endangered Southern California Steelhead

The Plan is intended to serve as a framework for implementing water management strategies in multiple watersheds throughout San Diego County. There is no mention in the Plan, however, of the historic or current presence of the endangered Southern California steelhead in most of these watersheds. The Plan's Appendix 3D purports to identify the "endangered and threatened species in the San Diego IRWM area." It accurately reports that the northern boundary of the steelhead's range is the Santa Maria River in Santa Barbara County. It erroneously states, however, that the southern boundary of that species' range is the San Mateo Creek. As discussed in greater detail below, the southern boundary of the species' range is actually, the U.S.-Mexico border.

The National Marine Fisheries Service (NMFS) estimates that annual, historic runs of Southern California steelhead have declined from 32,000-46,000 adults to currently less than 500 today. NMFS Southern California Steelhead Recovery Plan (NMFS Recovery Plan) at xiii. (January 2012). In 1997, an Environmentally Significant Unit (ESU) of the Southern California steelhead was listed as an endangered species under the federal Endangered Species Act – i.e., “a species that is in danger of extinction throughout all or a significant portion of its range.” Under this “first” listing, the original ESU boundaries ran from the Santa Maria River in the north to Malibu Creek in the south. In 2002, however, the range of the ESU was extended south to the U.S.-Mexico border. NMFS Recovery Plan at 1-4. In 2006, the ESU nomenclature was changed to Distinct Population Segment (DPS). Following a subsequent status review of West Coast steelhead populations in 2005, NMFS made a final listing determination for the Southern California steelhead DPS. NMFS Recovery Plan at 1-4. The current “designation for the Southern California steelhead DPS encompasses all naturally spawned steelhead between the Santa Maria River (inclusive) and the U.S.-Mexico border.” NMFS Recovery Plan at 1-4.

Accordingly, CalTrout and Trout Unlimited request that the RWMG and its consultants revise the Plan’s Appendix 3D to reflect the Southern California steelhead’s actual range is the Santa Maria River in the north and extends through San Diego County and the San Diego IRWM area to the U.S.-Mexico border. Further, because the species’ range includes the San Diego IRWM area, CalTrout and Trout Unlimited request that the RWMG and its consultants implement the final Plan in a manner that protects and restores this endangered fish and its habitat.

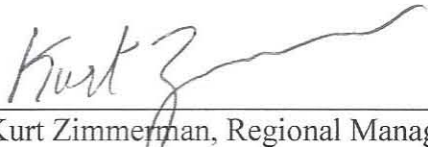
Consistency with NMFS Recovery Plan

Another omission in the Plan is any reference to the afore-mentioned NMFS Recovery Plan. The federal Endangered Species Act mandates that NMFS develop and implement recovery plans for the conservation of listed species. In January 2012, NMFS issued its NMFS Recovery Plan for the endangered Southern California steelhead. NMFS considers the implementation of the NMFS Recovery Plan to be absolutely vital to the continued persistence and recovery of the species. Indeed, the Recovery Plan identifies the Southern California steelhead population inhabiting the Santa Margarita River and the San Luis Rey River, which are watersheds located in the San Diego IRWM area, as “Core 1.” A Core 1 population has “the highest priority for recovery actions based on a variety of factors” (NMFS Recovery Plan, 7-3 to 7-6, 13-20). In addition, the Recovery Plan has proposed recovery actions in those watersheds as “Critical Recovery Actions.” NMFS Recovery Plan at p. 13-20. A Critical Recovery Action has the highest priority across the DPS and within core watersheds to achieve recovery objectives and criteria.” NMFS Recovery Plan at 7-6. The NMFS Recovery Plan also contains a list of proposed steelhead recovery actions in other watersheds in the San Diego IRWM area including the San Diego River, the San Dieguito River, the Sweetwater River, the Otay River and the Tijuana River. NMFS Recovery Plan at 31-21 to 13-79.

Accordingly, CalTrout and Trout Unlimited request that the RWMG and its consultants reference the NMFS Recovery Plan in the final Plan. Further, CalTrout and Trout Unlimited request that the RWMG and its consultants implement the final Plan in a manner that is consistent with the NMFS Recovery Plan and with special attention to NMFS’ proposed recovery actions in the San Diego IRWM area.

CalTrout and Trout Unlimited appreciate the RWMG's consideration of the foregoing comments on the Plan. If RWMG has any questions regarding this letter, please feel free to contact the undersigned, Kurt Zimmerman at (415) 590-0157.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kurt Z", with a long, sweeping horizontal line extending to the right.

Kurt Zimmerman, Regional Manager
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SDIRWM Comment Matrix - Public Draft of the 2013 IRWM Plan							
Comments Received During the July Watershed Workshops							
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#	Commenter	When/How Received	Page*	Location*	Comment	Recommended Edit(s)/Responses	Plan Change Made?
1	Meeting-attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Can we have a copy of the Watershed Workshop Presentation?	Yes. Please visit www.sdirwmp.org .	No
2	Meeting attendee	7/11/ Watershed 1/ Verbal	7-11	Chapter 7, Section 7.4.2	We would like a chance to review the Regional Board's Practical Vision document – there are concerns that this will not align with our goals (City of Oceanside), in which case we would be concerned about its inclusion in the IRWM Plan.	The Regional Board's Practical Vision document is not yet available for public review. The language in the 2013 IRWM Plan regarding the Practical Vision (refer to Chapter 7) is non-committal, and referenced for information. We have made additional edits to Table 7-6 to ensure that it is clear that the information presented in the IRWM Plan is draft information shared with the IRWM Program, and does not represent the Regional Board's final Practical Vision.	Yes
3	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Would like to see information about water rates – there is no mention of rates or a mention of a sliding scale or fixed scale for low-income folks.	Chapter 3 (Region Description) section on DACs (Section 3.3) was updated to state that DACs in the urban areas have expressed concerns regarding water rates and the affordability of water.	Yes
4	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Would like to see more open disclosure of Water Authority costs. Similar to the concerns regarding the Metropolitan Water District of Southern California, we need open disclosure for costs and rates at the regional level.	Chapter 3 (Region Description) section on Water Demand and Supply Diversification (Section 3.10) was updated to have a general discussion on costs associated with supply development.	Yes.
5	Meeting-attendee	7/11/ Watershed 1/ Verbal	N/A	Chapter 4	Appreciate the re-write of the Tribal Chapter (Chapter 4). It is much better!	N/A	No
6	Meeting attendee	7/11/ Watershed 1/ Verbal	7-11	Chapter 7, Section 7.4.2	If the Regional Board's Practical Vision isn't final, it should not be referenced in the IRWM Plan.	See response to comment #2 above.	Yes
7	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	The San Luis Rey Watershed Council also has comprehensive goals and priorities, as do many individual groups in the Region. Are all of these groups' visions included along with the Regional Board's Vision?	Yes. The San Luis Rey Watershed Council's list of priority issues is included in the Management Issues and Conflicts section of Chapter 5 for the San Luis Rey Watershed (Section 5.3). All watershed-specific vision statements will remain in the Watershed Chapter (Chapter 5).	No.
8	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	The level of communication and openness has been impressive during the IRWM Plan development. Would like to see the communication remain open moving forward.	General communication will continue through quarterly RAC meetings. The RWMG will determine the topics and discussions for future RAC meetings at a later time - the IRWM Plan will not be amended to include this information.	No.
9	Meeting attendee	7/11/ Watershed 1/ Verbal	3-67	Chapter 3 - Stormwater Management	Is information about the Regional Board's new stormwater permit in the IRWM Plan?	Section 3.5.9 on Stormwater Management includes information about the MS4 Permit. This section was updated to include more information about the WQIPs, which will identify future implementation projects. In the Section 3.7 , Water Quality, we added a cross-reference that acknowledges that major regulations associated with water quality are discussed in Section 3.5.9 .	Yes
10	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	How does integration work in the cross-jurisdictional watersheds such as Santa Margarita and Tijuana?	Coordination with the Santa Margarita Watershed occurs through a formal governance agreement (Memorandum of Understanding - MOU). The MOU allows the San Diego IRWM Region to coordinate with the Upper Santa Margarita Watershed on IRWM planning, and on interregional projects. The Tijuana Watershed coordination is more difficult due to international coordination issues. Although the IRWM Region is committed to working with the Tijuana stakeholders, IRWM funding cannot be spent on projects that are not located within the United States.	No.
11	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	Chapter 5 - San Luis Rey Watershed	For the San Luis Rey Watershed – the first 12 miles of the river have been actively managed by the United States Army Corps of Engineers (ACOE) since about 2001/2002. Given the City of Oceanside's dependence on this water (from the San Luis Rey River) and the quality of this water, active management in the river needs to be addressed.	Have updated Section 5.3 to include information that is available about the Army Corps of Engineers' involvement in the San Luis Rey Watershed, including their long-term Operation and Maintenance Plan to remove riparian vegetation along the river in Oceanside to maintain the river's flood capacity (San Luis Rey River Flood Control Project).	Yes.
12	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Issue regarding the Santa Margarita River going through Camp Pendleton – it is really difficult to work on projects on the river because of jurisdictional issues. How are you doing this?	The IRWM Program has facilitated successful relationships with Camp Pendleton, and the County of San Diego is working with Camp Pendleton on implementation of the Santa Margarita River Nutrient Study.	No.
13	Meeting attendee	7/11/ Watershed 1/ Verbal	Page 4-18	Section 4.7.2 Waters of the San Luis Rey River and Colorado River	Regarding San Luis Rey: there are some issues with the characterization regarding year-round flows. The numbers are reported as an average, but the river is dry most years. Please revise.	Have revised to describe the intermittent nature of this water body, and have removed the reference to average flows in Section 4.7.2 .	Yes.

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14	Meeting-attendee	7/11/ Watershed 1/ Verbal	Page 4-19	Section 4.7.2- Waters of the San Luis Rey River and Colorado River	Characterization of 5-party litigation is ok	N/A	No.
15	Meeting attendee	7/11/ Watershed 1/ Verbal	5-21	Chapter 5 - San Luis Rey Watershed - Natural Resources	Restoration of steelhead research is mentioned from US Fish and Wildlife Service and California Department of Fish and Wildlife. This is being brought forward to implementation, should be included.	We have discussed the steelhead restoration efforts with applicable regulatory agencies. We have not revised the text, because we received input that we should not over-state the potential effect of the National Marine Fisheries Service Steelhead Recovery Plan on the future of the lower basin, in particular the uses/impacts to the Santa Margarita River. Because future impacts are not yet known, we have not included speculative information about what may occur in the future.	No.
16	Meeting-attendee	7/11/ Watershed 1/ Verbal	5-21	Chapter 5 - San Luis Rey Watershed - Natural Resources	In the North County Multiple Species Conservation Plan (MSCP), the San Luis Rey is one of the main focal points: is this included?	Yes, MSCP is included in Section 3.8 of the Region Description Chapter (Chapter 3).	No.
17	Meeting attendee	7/11/ Watershed 1/ Verbal	5-21	Chapter 5 - San Luis Rey Watershed - Natural Resources	Tribal Nations Chapter mentions that MSCPs are a concern to tribal nations, because the MSCP often views undeveloped tribal lands as open space for conservation, and may not consider tribal development plans. While this is in the tribal chapter, it is not in the watersheds chapter.	We have revised the Plan to include this information in the watershed chapter, indicating each watershed that contains tribal land and may be concerned with these issues.	Yes.
18	Meeting-attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Will IRWM address Salt and Nutrient Management Plan (SNMP) requirements?	Yes, the SNMP requirements and relevant SNMPS in the San Diego IRWM Region are described in Chapter 7.	Yes
19	Meeting-attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Who is responsible for developing SNMPS?	Information is provided in Chapter 7 - as per the Recycled Water Policy, those stakeholders with a vested interest in groundwater are responsible.	No.
20	Meeting-attendee	7/11/ Watershed 1/ Verbal	5-22	Chapter 5 - San Luis Rey Watershed - Mgmt. Issues	In addition to the mention of damming and diversions, please include information about sand blockage and the need for sand replenishment.	Sand replenishment is included in the issues section. We can include in the stormwater/flooding as well.	No.
21	Meeting attendee	7/11/ Watershed 1/ Verbal	5-20 and 5-21	Chapter 5 - San Luis Rey Watershed - SW and Flood Mgmt.	San Luis Rey River flood control elements are complicated and should be elaborated upon. Suggest adding information about the conflicts between the Army Corps of Engineers and the City of Oceanside, which have led to increased riparian habitat in the flood control channel.	Yes, we have included this information. Please see response to comment #11.	Yes
22	Meeting-attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Please mention the conjunctive use project that is being implemented on the Santa Margarita River by the Fallbrook Public Utilities District and Camp Pendleton.	Yes, we will include this information.	Yes
23	Meeting-attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Is the San Luis Rey Watershed Council included as a stakeholder group?	Yes, the council is acknowledged in Chapter 5 (Watersheds) and Chapter 6 (Stakeholder Involvement).	Yes
24	Meeting-attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Is it indicated that part of the City of Oceanside lies in the Carlsbad Watershed?	Yes, this information is included in the Carlsbad Watershed section of the Watershed Chapter (Chapter 5).	Yes
25	Meeting-attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	You mentioned conjunctive use between Pendleton and Fallbrook Public Utilities District, but the US Bureau of Reclamation is also included in this effort.	Yes, we will make sure that the US Bureau of Reclamation is included when discussing the Santa Margarita River conjunctive use project.	Yes
26	Meeting attendee	7/11/ Watershed 1/ Verbal	5-20 and 5-21	Chapter 5 - San Luis Rey Watershed - SW and Flood Mgmt.	When describing the channelized flood control facilities, can you please mention their limitations? In 1916 there was a flood that wiped out a large part of Oceanside - this flood had a flow rate of about 96,000 cubic-feet per second (cfs). This kind of flood could still cause substantial damage, because the flood control channel is only rated to handle a flow of 87,000 cfs.	Yes, we have included information about the maximum capacity of the channel with respect to potential flood flows.	Yes

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27	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	You mentioned the SNMPs that were occurring in the Region. Are these discussed in the Plan?	Yes—see Chapter 7.	No.
28	Meeting attendee	7/11/ Watershed 1/ Verbal	5-13 and 5-14	Chapter 5 - SMR Watershed - Natural Resources	With regards to the mention of steelhead and its special status, there is a lot of concern about this designation and the ongoing Santa Margarita River nutrient project.	See response to comment #15 above.	No.
29	Meeting attendee	7/11/ Watershed 1/ Verbal	5-14 and 5-15	Chapter 5 - SMR Watershed - Mgmt. Issues and Conflicts	Issues between Rancho California Water District and Pendleton are not fully discussed, Rancho California Water District would like to provide additional comments.	Information was provided by Denise Landstedt from Rancho California Water District (see comments 53-55 in the Written Comments Matrix). We coordinated with Camp Pendleton and Fallbrook Public Utilities District to make sure that all parties are comfortable with the revisions provided by Denise.	Yes.
30	Meeting attendee	7/11/ Watershed 1/ Verbal	5-12	Chapter 5 - SMR Watershed - Water Quality	The water quality section mentions that the upper watershed (in Riverside County) contributes water quality issues to the lower watershed. Would like to better explain this relationship.	We have made revisions to this section per information provided by the upper watershed (Rancho California Water District).	Yes.
31	Meeting attendee	7/11/ Watershed 1/ Verbal	5-12	Chapter 5 - SMR Watershed - Water Quality	The information about the SNMP needs to be modified – this is characterized as across the watershed, when it is really just for the Temecula Groundwater Basin and other specific groundwater basins. Please describe all of the SNMP efforts in the watershed.	We have revised this section to clarify efforts in the watershed vs. in specific basins. We will include all SNMP efforts in the Region into Chapter 5.	Yes.
32	Meeting attendee	7/11/ Watershed 1/ Verbal	5-15	Chapter 5 – SMR Watershed – Mgmt. Issues and Conflicts	The information about the Santa Margarita River project presents information about the watershed – the funding was not for the watershed, but for the river. Please revise.	We will revise this section to clarify that the Santa Margarita nutrient project pertains to the Santa Margarita River, not the Santa Margarita Watershed as a whole.	Yes
33	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	DAC Issues - SLR	Add information about water rates and sliding scales	See response to comment #3 above.	Yes
34	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	DAC Issues - SLR	Add information about poor civic planning that impacts DACs. This includes increasing high-density and low-income housing near flood-prone areas. This is true of the area surrounding Loma Alta Creek. This is also true of public transit, as the Sprinter line is located within the floodplain.	Section 3.3 already includes information about flooding in DACs.	No
35	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	DAC Issues - SLR	Should consider discussing rehabilitation, including rehabilitating high-density land uses in the floodplain into open space for flood control purposes.	Information about the opportunities available to practice integrated flood management are described in Section 7.6.	No.
36	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	Region Description?	With regards to flooding, there is a lot of concern as flooding as it pertains to the Federal Emergency Management Agency (FEMA). The Natural Hydrologic Warning Council is particularly concerned with how FEMA removes areas from a designated floodplain once flood control facilities have been installed. This is an issue, because it allows development to occur in areas that are still prone to flooding.	Section 3.5.10 includes information about flood mapping. The Region Description has been amended (Section 3.5.10) to include information about modifications to FEMA mapping that is possible through official Letter of Map Change requests approved of by FEMA.	Yes.
37	Meeting attendee	7/11/ Watershed 1/ Verbal	Figures	Figure 3-4A and 3-4B	Concern with some areas on the map that are not characterized as DACs. For example, in Pauma Valley there are a few areas with high income, but the area is predominately low income	Yes, we agree. We have purchased additional data to show as many of the officially mapped DAC areas as possible. The issue is the scale of the data, and we have currently purchased data at as fine of a scale as possible. We have included additional information about this issue and the potential accuracy (and inaccuracy) of the DAC maps in the Region Description (Section 3.3). We have also included information about how additional income surveys can be used to supplement the DAC maps.	Yes.
38	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	DAC Issues - General	In the rural areas, there are issues with household hazardous waste since the County got rid of their program for transfer stations.	Have included additional information into Section 3.3 on DACs about the County's Household Hazardous Waste Program. Information about illegal dumping is already included in Section 3.3.	Yes.
39	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	DAC Issues – General	In the rural areas there is not enough money for wastewater treatment and disposal	Yes, this is discussed in Section 3.3 of the Region Description.	No.

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40	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	DAC Issues - Tribal	There is a general issue concerning tribes and DWR – tribes, especially tribal DACs would like to participate in the IRWM Program, but are concerned with DWR's CEQA requirements on tribal lands.	Yes, this information is included in the Tribal Nations Chapter (Chapter 4). We have also included this information in the Implementation Chapter (Chapter 11) when discussing potential implementation issues.	Yes.
41	Meeting attendee	7/11/ Watershed 1/ Verbal	Figures	Figure 3-4A and 3-4B	In Oceanside there are several mobile home parks, which do not appear to be on the DAC map. There are also several senior communities that are likely not on the map.	See response to comment #37 above.	Yes
42	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	DAC Issues - SLR	In Oceanside there are more issues with young homeless populations.	We have included information about homelessness as it pertains to water resources issues in Section 3.3 of the Region Description.	Yes.
43	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	DAC Issues - SLR	In the San Luis Rey Watershed there are several mobile home parks within the floodplain.	See response to comment #37 above.	Yes
44	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	DAC Issues - General	Is it possible to expand the definition of a DAC beyond the DWR definition? Could we use something such as the percentage of low-income people in a certain area?	See response to comment #37 above. For the Region, we can determine our own definition of DACs, and can use additional information such as income surveys. That information has been included in Section 3.3 .	Yes
45	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	There is an issue with TDS in the drinking water. It seems like this should be treated further to remove TDS – with reverse osmosis systems.	Yes, there is information about water treatment in Section 3.5 of the Region Description.	No.
46	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	DAC Issues – General	Look at the EPA Financial Hardship definition – this may give some additional information. It is from the Integrated Planning and Permit Process.	Thank you, we will look into this data source.	No.
47	Mary Clarke	7/11- Workshop- Comment- Form	N/A	San Luis Rey River Watershed	Two issues relating to San Luis Rey watershed: 1) There are a lot of homeless/transient people who camp along the river, especially in the Oceanside area. I expect they are using it as a sewer. They also start fires in the brush. 2) A few years ago, there was an issue about clearing brush along the river in the Oceanside area. The problem related to the endangered avian species living in the brush. Some sort of compromise was reached, I think, but some of the endangered birds were "taken". It should be noted in your Plan that the wetlands habitat along the SLR River are inhabited by endangered avian species.	See response to comment #34 above regarding the issue of homeless. With regards to avian species, we will add this information into the Natural Resources section of the San Luis Rey Watershed in Chapter 5.	Yes
48	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	N/A	Is the IRWM Plan available on a website?	Yes, please visit: www.sdirwmp.org	No.
49	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	N/A	Is information included about water availability and water use?	Yes, there is information about supplies and demands in Section 3.10 of the 2013 IRWM Plan.	No.
50	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	N/A	Is grey water mentioned in the Plan? Is it legal in San Diego?	Greywater was not mentioned in the Draft 2013 IRWM Plan. The Plan has been modified, and now includes a new section (Section 3.5.8) on conservation, which includes information about greywater and greywater regulations.	Yes.
51	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	N/A	Are alternative water sources (recycled water, potable reuse) described in the Plan?	Yes, we have added substantial information about potable reuse into a new section (Section 3.5.5), which explains both non-potable (recycled water) and potable reuse.	Yes.
52	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	N/A	Are stormwater regulations (new MS4 Permit) taken into account in the Plan? What is the IRWM Plan's relationship to the Regional Board?	Yes. See response to comment #9 above.	Yes.
53	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	General	In general the Plan needs much more information on stormwater and water quality. The way the Plan currently reads, it seems very biased towards water supply agencies.	Yes. See response to comment #9 above. In addition, we worked with various MS4 Co-Permittees to gather additional stormwater and water quality information for the Region Description and the Watersheds chapters.	Yes.

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54	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	General	There needs to be more discussion about brownfields in the urban areas. As these areas are developed, developers and communities will need to figure out how to contain stormwater. This presents a substantial challenge to development and economic growth in the urban areas.	Yes, we have included information into Section 3.5.9 about how the new MS4 Permit may affect development and redevelopment efforts.	Yes.
55	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	Chapter 5	In Chapter 5, the section on "Water Quality" should really be called "Water Impairments", as these sections only discuss 303(d) listings.	We have expanded each of these sections to include more generalized information about water quality to provide balance to information about the impairments.	Yes.
56	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	Chapter 5	In Chapter 5 there are some references from the Port of San Diego — this is not correct, as the Port's data comes directly from the Regional Board. Please revise.	We will look at these references and try to reconcile with applicable Regional Board references.	No.
57	Meeting attendee	7/12/ Watershed 2/ Verbal	5-69	Chapter 5 — Pueblo Climate Change Impacts	The climate change section for Pueblo mentioned sea-level rise. Is there any current evidence of this?	For now, no; however, due to the low-lying coastal areas in this watershed, this watershed is considered susceptible to sea-level rise impacts.	No.
58	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	Chapter 5 - Pueblo	When it rains (in the Pueblo Watershed), how much water is captured verses how much runs to the Pacific Ocean (San Diego Bay)?	An exact number is not known, but rainwater capture is relatively minor. The City is working on more infiltration and low-impact development projects to increase stormwater capture.	No.
59	Meeting attendee	7/12/ Watershed 2/ Verbal	5-69	Chapter 5 — Pueblo Stormwater and Flood	The stormwater flood section on the Pueblo Watershed (Page 5-69) mentions the County. This is incorrect, the County has very little jurisdiction in this watershed.	Yes, we will revise accordingly.	Yes
60	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	General	Concerned about pollution in reservoirs – have the City's efforts on this issue been successful?	Yes, we have updated Section 3.7.2 (Surface Water Quality) to specifically mention the City's development guidelines for source water protection.	Yes
61	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	Chapter 5 - Tijuana	Are there wastewater treatment facilities in Mexico?	Yes, we have included information about cross-border facilities in the Tijuana Watershed characterization (Section 5.11 of Chapter 5).	Yes
62	Meeting attendee	7/12/ Watershed 2/ Verbal	5-95	Chapter 5 - Tijuana-Natural Resources	There should be more information about invasive species impacting the Tijuana River – this has been documented by SDSU, and is a serious issue. Arundo is especially concerning for flooding issues.	Yes, we have included more information about invasive species in the Tijuana Watershed characterization (Section 5.11 of Chapter 5).	Yes
63	Meeting attendee	7/12/ Watershed 2/ Verbal	5-84	Chapter 5 — Otay- Water Quality	In the Otay Watershed, Poggi Canyon is mentioned as being listed for DDT. This is not accurate, it was recently de-listed.	We will revise accordingly.	Yes
64	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	Chapter 5 - Tijuana	There is going to be more emphasis, especially in the near future on the Tijuana River and the Tijuana Watershed. The US and Mexico are in the process of drafting a new bi-national agreement to deal with the southern portion of the river. Suggest contacting the US section of the International Boundary and Water Commission.	Yes, we have included information about cross-border efforts in Section 3.13 of the Region Description and in the Tijuana Watershed characterization (Section 5.11 of Chapter 5).	Yes
65	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	General	Does Tijuana have digital map of most contaminated areas? Would be good to know where the major cross-border issues are.	The Mexico government is working on this, and will have this information in the future.	No.
66	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	Chapter 5 - Tijuana	Would like to acknowledge the cooperation between Mexico and San Diego on cross-border issues through the International Boundary and Water Commission. This has been a highly successful cooperation effort that is considered a model for international collaboration around border issues with water.	Yes, we have included information about cross-border efforts in Section 3.13 of the Region Description and in the Tijuana Watershed characterization (Section 5.11 of Chapter 5).	Yes
67	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	Chapter 5 - Tijuana	The Plan should address hydromodification issues associated with the border – the wall itself presents huge hydromodification issues.	Yes, we have included information about border-related hydromodification in the Tijuana Watershed characterization (Section 5.11 of Chapter 5).	Yes
68	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	General	Can you show the entire Tijuana watershed? It isn't appropriate to cut the watershed off at the border.	Yes, we will revise relevant figures to include the entire watershed.	Yes.

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69	Meeting-attendee	7/12/ Watershed 2/ Verbal	N/A	General	Can we highlight successful watershed-based projects? There are many success stories that should be told.	Yes, we will include successful project examples into the watershed chapter.	Yes.
70	Meeting-attendee	7/12/ Watershed 2/ Verbal	N/A	Chapter 5— Pueblo	There is a need to acknowledge what has been done regarding water quality, stormwater, and TMDL compliance—especially in the Chollas-Creek area with Groundwork San Diego.	Yes, we will include successful project examples into the watershed chapter.	Yes.
71	Meeting-attendee	7/12/ Watershed 2/ Verbal	N/A	General	Are there homeowners association policies to monitor water flow and water quality? These associations often have high stormwater runoff and pollution. These areas are often strict about water-wise landscaping, this is a huge issue in the South Bay.	Yes, we have included information into the new section on Conservation (Section 3.5.8, see comment #50) about water wise landscaping and potential vegetation restrictions.	Yes.
72	Meeting-attendee	7/12/ Watershed 2/ Verbal	N/A	General	Does the Plan acknowledge state-of-the-art planning tools such as the tools that SANDAG is developing for watershed planning (spatial tools)?	No, but we will work with our SANDAG contacts to gather this information.	No.
73	Meeting-attendee	7/12/ Watershed 2/ Verbal	Figures	Figure 3-4A and 3-4B	Clarification about the map (dark vs. light purple)—does this show that the Sweetwater area was previously not a DAC (light purple, 2010 data) but now is (dark purple, 2013 data)?	Not necessarily—the 2013 data is on top of the 2010 data and may be over shadowing the older data. We will modify the 2013 data layer so that it does not cover the 2010 layer.	No.
74	Meeting-attendee	7/12/ Watershed 2/ Verbal	Figures	Figure 3-4A and 3-4B	The data seem very wrong! It seems unbelievable that the eastern area is not categorized as a DAC.	Yes, we agree. See response to #37 above.	Yes
75	Meeting-attendee	7/12/ Watershed 2/ Verbal	N/A	General - DAC	Illegal dumping is a serious issue in the South Bay DACs.	Yes, we have added this information to the general DAC chapter (Section 3.3).	Yes
76	Meeting-attendee	7/12/ Watershed 2/ Verbal	N/A	General—DAC	Thank you for separating urban vs. rural DACs—this is an important distinction.	N/A	No.
77	Meeting-attendee	7/12/ Watershed 2/ Verbal	N/A	General - DAC	One thing to add: climate change impacts poor first. This is especially true for water and food security issues.	The IRWM Plan does not discuss climate change impacts in terms of who is impacted first. There is extensive information in the plan (refer to Section 7.8) on potential water resource-related climate change impacts	No.
78	Meeting-attendee	7/12/ Watershed 2/ Verbal	N/A	General - DAC	The cost of water is an issue for urban DACs. Community gardens and other projects to promote food security in urban areas can be hampered by water costs. Could these urban farms get agricultural water rate subsidies?	Information is provided in Section 3.3 on DACs regarding the trend, especially for urban DACs, to create community gardens. Community gardens can be effective as an educational tool for water use efficiency.	No.
79	Meeting-attendee	7/12/ Watershed 2/ Verbal	N/A	General—DAC	Do you get extra points (in the IRWM project selection process) for projects within DACs?	Yes, see Chapter 9 for information about the project scoring process.	No.
80	Meeting-attendee	7/12/ Watershed 2/ Verbal	N/A	General—DAC	Does the project selection process consider projects that will help water districts lower costs and potentially lower water rates? Lowering the cost of water will directly benefit urban DACs.	Refer to Chapter 9 for information about the scoring process—lowering water rates for DACs is not currently a project selection criterion.	No.
81	Meeting-attendee	7/12/ Watershed 2/ Verbal	N/A	General—DAC	What about providing water via greywater systems? This would be a way to directly provide water to urban DACs.	That would be a great project! We have not received a greywater project to date.	No.
82	Meeting-attendee	7/17/ Watershed 3/ Verbal	5-29	Chapter 5 - Carlsbad-Hydrology	Cottonwood Creek, which drains into Moonlight Beach, was not mentioned. This is an important effort to recognize. The effort involves a separate, organized group, which has made notable improvements in water quality.	Yes, we have included information about this effort into Section 5.4 of the Watershed Chapter (Water Quality section).	Yes.
83	Meeting-attendee	7/17/ Watershed 3/ Verbal	N/A	Chapter 5 - Carlsbad	Always concerned about Lake San Marcos voluntary planning efforts. These efforts are substantial, and involve many parties.	Yes, we have highlighted this effort in Section 5.4 of the Watershed Chapter (Carlsbad Watershed).	Yes.

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84	Meeting attendee	7/17/ Watershed 3/ Verbal	5-32	Chapter 5 - Carlsbad-Mgmt. Issues	Agua Hedionda Watershed Urban Runoff Management Plan (WURMP) needs to be included. In addition, please mention that proposed development along Agua Hedionda Creek. This development would involve building about 200 dwelling units alongside the creek, and would result in substantial riparian habitat removal. It is a controversial project, which is opposed by many.	While the Watershed Chapter does not include information about specific developments such as these, we have mentioned that development and expansion of urban areas alongside important water bodies is a concern, particularly for the removal of riparian habitat. The Watershed Chapter does include information from the Agua Hedionda WURMP.	Yes.
85	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	Chapter 5— Carlsbad	Based on the research done for the plan — can you explain how the Carlsbad Watershed is different from others in the Region?	The Carlsbad Watershed is unique for many reasons, including: it is diverse, with many jurisdictions, it is highly urbanized, it is comprised of several small catchments, it experiences substantial stormwater issues (due to urbanization), and has many institutional (jurisdictional) issues. In addition, the watershed itself is comprised of several small interconnected water systems — these are somewhat like six small watersheds within the larger watershed. Some consider this watershed to be a miniature IRWM Region itself due to the diversity and watershed composition.	No.
86	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	N/A	If we had documents, how do we send them for inclusion in the IRWM Plan?	Documents that can be sent by email, please send to Rosalyn Prickett: rprickett@rmcwater.com. If documents are too large to email, please either send a link (if available online), or email Rosalyn Prickett to get access to the FTP site.	No.
87	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	Chapter 5 - Carlsbad	There is scientific research that demonstrates how the complexity of water infrastructure systems can impair the understanding and management of water within a region, and can have substantial impacts on water quality. Is there a cumulative way that these systems are being tracked and understood? Specifically, is information on water transfers tracked?	We will include information in the Watershed Chapter (Chapter 5) about major water transfers between watersheds. Those transfers include: 1) San Luis Rey - Wohlford, 2) San Dieguito/Carlsbad - ESP, 3) TJ/Otay - Dulzura Conduit, 4) San Diego River - Stormwater Imports, and 5) Sutherland to San Vicente Reservoir	Yes.
88	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	N/A	Adding the watershed-specific information into a large-scale planning document such as the IRWM Plan is important and encouraging. Will this watershed emphasis be carried through to the project selection process?	Yes, see Chapter 9 for information about the project scoring process.	No.
89	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	Chapter 5— Carlsbad	This watershed is particularly unique. With the implementation of the Emergency Storage Project, this watershed is linked to the regional imported water system (Lake Hodges). It seems that the issues presented for this watershed will be further elevated in the next project selection process, because the watershed now has such a regional connection.	Yes, see Chapter 9 for information about the project scoring process.	No.
90	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	N/A	The regional/watershed-based approach seems particularly important for groundwater management (salt and nutrient management planning).	Yes, the SNMP requirements and relevant SNMPs in the San Diego IRWM Region are described in Chapter 7.	No.
91	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	Chapter 3 - Region Description - Stormwater	How does the IRWM Program/IRWM Plan process align with the development of Water Quality Improvement Plans (WQIPs) for the new stormwater permit?	Yes. See response to comment #9 above. In addition, we have worked with various MS4 Co-Permittees to gather additional stormwater and water quality information for the Region Description and the Watersheds chapters.	Yes
92	Meeting attendee	7/17/ Watershed 3/ Verbal	5-31 and 5-40	Chapter 5— Carlsbad and San Dieguito Natural Resources	Please add that the County MSCP effort includes some of the Carlsbad Watershed — it covers Escondido Creek and a very small portion of the San Dieguito Watershed.	Yes, we will include this in the Natural Resources Section of Section 5.4.	Yes
93	Meeting attendee	7/17/ Watershed 3/ Verbal	5-31	Chapter 5— Carlsbad Natural Resources	Please add information about the Multiple Habitat Conservation Plans (MHCPs) from other municipalities. There are many in this watershed — for example, the City of Carlsbad has an approved MHCP.	Yes, we will include this in the Natural Resources Section of Section 5.4.	Yes
94	Meeting attendee	7/17/ Watershed 3/ Verbal	5-31	Chapter 5— Carlsbad Natural Resources	For the Carlsbad Watershed — the Natural Resources section has an error. This section mentions ongoing efforts to eradicate clerpa from Agua Hedionda. This effort is not ongoing — it was successful and has been completed.	Yes, we will include this edit in the Natural Resources Section of Section 5.4.	Yes

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95	Meeting-attendee	7/17/-Watershed 3/-Verbal	5-31	Chapter 5—Carlsbad-Stormwater-and-Flood	For the Carlsbad Watershed—the Stormwater/Flood section has an error. Lake San Marcos is mentioned as a flood control facility. This lake is only for agricultural irrigation, and is not part of the flood control system.	Yes, we will include this edit in the Stormwater and Flood Management Section of Section 5.4.	Yes
96	Meeting-attendee	7/17/-Watershed 3/-Verbal	5-30	Chapter 5—Carlsbad Water Quality	For the Carlsbad Watershed—the Water Quality section needs to be updated. Some of the 303(d) listings are not accurate—specifically, the Pacific Shoreline is no longer listed at Buena Vista Creek.	Yes, we will include this edit in the Water Quality Section of Section 5.4.	Yes
97	Meeting-attendee	7/17/-Watershed 3/-Verbal	N/A	Chapter 11—Implementation	You mentioned that the 2013 IRWM Plan includes a section on diversification of funding. What information is included?	This section, located in Chapter 11, Implementation, includes information about funding for the IRWM—Program and IRWM projects. For the IRWM Program, it is acknowledged that to date, funding has come from statewide sources (water bonds). This section mentions that future water bond funding, and therefore future IRWM Program funding is uncertain. This section also provides information about a variety of other grant and loan programs that project sponsors could look to for other funding options.	No.
98	Meeting-attendee	7/17/-Watershed 3/-Verbal	N/A	General—DAC	Cannot believe that there are mapped DACs in Sorrento Valley! This seems false.	Yes, we agree. See response to #37 above.	Yes
99	Meeting-attendee	7/17/-Watershed 3/-Verbal	N/A	General—DAC	Do projects get prioritized if they are within a mapped DAC?	Yes, see Chapter 9 for information about the project scoring process.	No.
100	Meeting attendee	7/17/Watershed 3/Verbal	N/A	General - DAC	Even though the DAC project requirements are limited to “critical” water quality and water supply issues—in our region, it is important to consider water quality improvements associated with stormwater. This is especially true for small projects such as community gardens that capture and reuse greywater.	Yes, we have included additional information in the plan regarding DAC requirements to make it clear that the “critical” water quality and water supply requirement is something established by DWR for grant purposes. See #37.	Yes.
101	Meeting attendee	7/17/Watershed 3/Verbal	N/A	N/A	What are the next steps? How will we know if our comments are addressed in the Plan?	Comments were discussed with the Regional Advisory Committee on August 7th, 2013. Comments will also be condensed and included as Appendix 6-D to the Final 2013 IRWM Plan.	Yes.
102	Dave Draper	7/17 Workshop, Verbal to Rosalyn	5-39	Chapter 5 - San Dieguito Water Quality	Lake Hodges water quality is widely known to be poor. The City of San Diego has been negligent/irresponsible in allowing vegetation to grow in the reservoir, thereby creating ongoing water quality/pollutant problems. The City needs to develop and implement a plan to control vegetation in the primary lake area in order to mitigate these problems. Vegetation grows up when the lake levels recede so fluctuation in lake levels is also a problem - it degrades lake water quality and restricts blending opportunities for the water suppliers.	Yes, we have included additional information into Section 5.5 regarding Hodges Reservoir and its water quality issues of concern.	Yes.
103	Meeting-attendee	7/19/-Watershed 4/-Verbal	N/A	N/A	Is the IRWM Plan available on a website?	Yes: www.sdirwmp.org .	No.
104	Meeting attendee	7/19/Watershed 4/Verbal	N/A	N/A	Residents have serious concerns with the River Park Foundation’s mission to create a park from the mountains to the ocean. What are the plans for private property owners who live in that area? There are major concerns with these types of organizations coming into private property (trespassing) to complete things like clean-ups.	We have included information about private property owner concerns associated with the San Diego River Park in Section 5.7 . The San Diego IRWM Plan is an umbrella document that takes into consideration the vision and mission of organizations such as the River Park Foundation; however, the IRWM Plan itself will not implement these ideals.	Yes.
105	Meeting-attendee	7/19/-Watershed 4/-Verbal	2	Highlights	The map that you showed has the Inaja and Cosmit tribal reservations outside of the IRWM Region—these tribal lands are within the coastal-draining watershed.	Thank you, we will amend this graphic. This is the tribal graphics in the Highlights document.	Yes.

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106	Meeting attendee	7/19/ Watershed 4/ Verbal	5-48	Chapter 5 - Peñasquitos - Mgmt. Issues and Conflicts	In the Peñasquitos Watershed, we are hugely frustrated with impacts to Rose Canyon and Rose Creek. It seems as though there is a lack of regional perspective for this area – environmental documents (California Environmental Quality Act [CEQA]) continue to be produced, and they claim that projects will have a less than significant impact to the environment. Cumulatively, these projects have a huge impact, and there is no protection for Rose Creek.	Yes, we have included information highlighting the Rose Creek effort and associated issues in Section 5.6 .	Yes.
107	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	N/A	How much funding is left for the San Diego Region in Round 3 of Proposition 84?	Approximately \$45 million.	No.
108	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	N/A	Would like to commend the efforts that have been taken to date to encourage the watershed-based approach that is being taken with the 2013 IRWM Plan. Hopefully this focus will continue forward when selecting projects for future rounds of funding.	N/A	No.
109	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	N/A	Why is there no environmental rubric that is used to determine environmental impacts under CEQA? Is this something that can be developed?	The determination of impacts under CEQA is complicated and project-specific. This is a state law that would be very difficult to amend to have a strict rubric.	No.
110	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	Chapter 9-	How are projects prioritized for IRWM Funding?	Refer to Chapter 9 of the 2013 IRWM Plan, which has this information in lengthy details. There are several steps: the first includes a general screening (does the project meet Objective A, B, and at least one other objective?) Next, there is a scoring process that takes place based on project merit. This information is given to a selection workgroup, which evaluates the projects, conducts interviews, and makes a final decision.	No.
111	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	N/A	The City of San Diego has been working on a Master Stormwater System Maintenance Program. This program attempts to identify flood control channels that require maintenance, and implement the recommended maintenance. In reality, this plan creates substantial water quality and habitat issues, and will result in habitat fragmentation. The real solution would be to identify necessary stormwater infrastructure that would meet water quality and flood control needs. Will the Plan address these issues?	Yes, we have included information about the Master Stormwater Maintenance Program into the Region Description (Section 3.5.9). The information was included in the Region Description rather than in the watershed chapter, because it pertains to more than just one watershed in the Region.	Yes
112	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	N/A	Thank you for including information about Famosa Slough; this is a very important resource to the Region.	N/A	No.
113	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	Chapter 5 - San Diego River	Please add information about importation of stormwater to the San Diego River Watershed as a significant source of pollution. The City of San Diego pumps stormwater runoff from outside the watershed into the San Diego River near Old Town and I-5.	Yes, we have included information about this transfer. See comment #87.	Yes.
114	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	Chapter 5— Peñasquitos	It seems as though Tecolote Creek was not mentioned as a water body that drains to Mission Bay.	This information is in the IRWM Plan, just was not included in the presentation.	No.
115	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	Chapter 5 - San Diego River	With regards to Famosa Slough – can you mention the extreme success of detention basins? These have been highly effective in managing stormwater and flood flows, and should be replicated throughout the watershed. Information can be found in the Famosa Slough Enhancement Plan.	Yes, we have included this information about Famosa Slough into Section 5.7 of the watershed chapter.	Yes.
116	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	Chapter 5 - Peñasquitos	Please mention that in Rose Canyon there is a huge issue with wet weather flows scouring out the creek. This issue is magnified, because the City will not allow mitigation projects to take place in the canyon. They are saving this riparian (wetland) mitigation for themselves, and therefore exporting compensatory mitigation outside of the watershed. This is a huge issue, and is resulting in habitat degradation.	Have included information about mitigation exportation in Section 3.8 of the Region Description, as this applies throughout the Region (not just Rose Canyon).	Yes

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117	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	Chapter 5 - San Diego River	Please mention the cold water streams in the upper reaches of the San Diego River Watershed – these are very imported.	Yes, we have included this information in explaining the difference between the mountainous (eastern) area and the coastal (urban) area of the watershed. We will mention that the mountainous area contains cold water habitat.	Yes.
118	Meeting attendee	7/19/ Watershed 4/ Verbal	5-55	Chapter 5 - San Diego River - Water Systems	Please amend your comment regarding Lake Cuyamaca – this water body only holds precipitation and stormwater flows. No imported water is stored in this water body.	Yes, we have amended this section to describe Cuyamaca Reservoir as storing only surface water.	Yes.
119	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	Chapter 5 - San Diego River	Please mention that there are also many small mutual water companies within the upper portion of the watershed.	Yes, we have included this information when explaining internal boundaries and land uses.	Yes.
120	Meeting attendee	7/19/ Watershed 4/ Verbal	5-57	Chapter 5 - San Diego River - Water Quality	Trash in San Diego River is a huge issue – not just for pollution, but also for flooding. Trash can cause blockages.	Yes, we have included information about trash as it relates to flooding.	Yes.
121	Meeting attendee	7/19/ Watershed 4/ Verbal	5-58	Chapter 5 - San Diego River - SW and Flood Mgmt.	Surprised to hear Mission Valley outlined as a flood control facility. It would be much more appropriate to highlight the Army Corps of Engineers' flood control channel.	Yes, we have amended this section to describe the Army Corps' flood control channel.	Yes.
122	Meeting attendee	7/19/ Watershed 4/ Verbal	5-59	Chapter 5 - San Diego River - Natural Resources	Please mention the San Diego River Estuary and its susceptibility to high rain flows – the estuary was basically demolished in the last huge rain storm (about 2003).	Yes, we have included this information about the San Diego River Estuary.	Yes.
123	Meeting attendee	7/19/ Watershed 4/ Verbal	5-59	Chapter 5 - San Diego River - Natural Resources	Please mention that the huge rush of fresh water from storm flows to the estuary impacts the intertidal zone.	Yes, we have included this information about the San Diego River Estuary.	Yes.
124	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	Chapter 5 - Peñasquitos	Please use the City of San Diego's nomenclature regarding the Mission Bay Park Plan – there is nomenclature for north and south areas, and it should be consistent.	We have used nomenclature consistent with the IRWM Plan (focus on roads and other notable features).	No.
125	Meeting attendee	7/19/ Watershed 4/ Verbal	5-49	Chapter 5 - Penasquitos-Mngmt Issues and Conflicts	Please mention issues with the Mission Bay Landfill Study. Although this study found that this landfill is not toxic and does not have seepage, many residents and stakeholders feel otherwise.	Yes, we will add the potential toxicity and seepage of the landfill as issues reported by stakeholders.	Yes.
126	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	General – DAC	Is the DAC map in the 2013 IRWM Plan?	Yes, it is in Chapter 3, Region Description.	No.
127	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	General - DAC-SD River	Please mention the homeless population in the San Diego River Watershed. About 20% of the unsheltered homeless population is along Mission Valley River.	Yes, we have included information about homelessness.	Yes
128	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	General - DAC-SD River	Homelessness presents implications for water quality and trash.	Yes, we have included this information about water quality and trash concerns.	Yes
129	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	General - DAC-SD River	Would like to mention that Ramona has both Urban DAC and Rural DAC issues. This is generally considered a rural area, but also has a large homeless population. This community also has a well-organized water company, even though it lies outside of the Water Authority's Service Area.	Yes, we have included information in Section 3.3 about how some DACs have both urban and rural features. We have specifically mentioned Ramona.	Yes.
130	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	Chapter 5 - San Diego River	Ramona also has issues with flooding – many are concerned with potentially catastrophic (loss of life) floods. Ramona also faces severe invasive species issues, and is concerned with groundwater reliance.	Yes, we can include this information in Section 5.7 on the San Diego River Watershed.	Yes.
131	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	General - DAC-SD River	There should not be DACs around Fiesta Island – nobody lives there!	Yes, we agree. We have clarified that the map is not perfect in the plan. See comment #37.	Yes
132	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	General - DAC	Both UCSD and Miramar should not be considered as DACs. It seems like this map is wrong – is another methodology possible?	Yes, we agree. We have clarified that additional survey data may supplement the DAC maps included in Chapter 3.	Yes

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Comments Received During the July Watershed Workshops							
NOTE: All comments that have been crossed out have been moved to the list of minor comments.							
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#	Commenter	When/How Received	Page*	Location*	Comment	Recommended Edit(s)/Responses	Plan Change Made?
133	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	General - DAC	Would projects receive DAC points if they themselves are not within a DAC, but would benefit DACs?	Yes, this is just something that would have to be demonstrated in the grant proposal.	No.
134	Jim Peugh	7/19 Workshop, Verbal to Rosalyn	N/A	Chapter 5 - San Diego River	Invasive species are a problem in watersheds throughout the region, but particularly in the San Diego River watershed. Invasive plant species degrade wildlife habitat, increase flooding, and degrade water quality.	Yes, have included information about invasive species in Section 5.7 .	Yes.

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1	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	1-1	2nd Bullet	replace "Negligible" groundwater supplies with "Sparse" or "Scarce" groundwater supplies. Groundwater is treated as an important element of the region's water supply portfolio in numerous citations throughout the document, including Objective E (pg. 5). Used conjunctively with surface water, groundwater is a significant source of supply for Lake Henshaw, which in turn provides a significant portion (roughly 20%) of the water supply for the City of Escondido and the Vista Irrigation District. For us, and for the region as a whole, groundwater is not a negligible source of supply.	Yes, we have revised the document to reflect the fact that groundwater supplies vary throughout the Region. The term negligible associated with groundwater has been revised or removed.	Yes.
2	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	3-6	Table 3-6: Existing and Projected Land Use within the County.	I realize this is not the thrust of this report, but observe that the first sentence on the page says that "No significant net decrease is projected in the acreage of San Diego County lands zoned for agricultural use", yet the Land Use "Other" in Table 3-6 (which includes water, road ROW, agriculture and military) shows a 40% decrease. Also, the total acreage of all land use types decreases from 3.11 to 2.86 million acres in the period 2008 to 2050.	This information is from the SANDAG RTP 2050. We have provided additional information to explain the numbers in the table.	Yes
3	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	3-43	Listing of major groundwater production sources at bottom of page	For the 30 years ending 2012, the Vista Irrigation District has pumped an average of 7,680 afy of groundwater out of the Warner Basin into Lake Henshaw. This may not be reflected in Water Authority records, because, for the purposes of the California Department of Public Health, this source is treated as a surface water source.	Yes, we have revised the Region Description to include this information about VID's usage of the Warner Valley Basin.	Yes.
4	Metro JPA Technical Advisory Committee (TAC)	7/22/13 Email to Rosalyn	N/A	Chapter 3, Region Description	Expand the discussion on the opportunity for wastewater reuse in the region and how it fits within the region's water management strategy. The recent success of the City's WPDP and associated progress on the legislative front establish wastewater reuse as a critical component of the region's future water supply. The discussion of water reuse and how it fits within the Region's integrated approach to water management must be expanded. This is especially important considering that the allocation of future IRWM funds will be tied to the areas advanced in the 2013 IRWM Plan Acknowledging that the draft IRWM Plan is built on the 2010 UWMPs, the topic of water reuse and the potential for AWP to play a significant role in the Region's water supply for the future has gained tremendous traction in the two years since the 2010 UWMPs were due to DWR. Expanded water reuse, which would include recycled water and advanced water purification/potable reuse, offers multiple benefits closely related to the goals of the IRWM Program.	Yes, we have amended the plan to include more information about reuse. Changes include: *Expanding discussion of recycled water in the Region Description to "Water Reuse" and including a discussion of "Potable Reuse" and "Non-Potable Reuse". This section will include information about the benefits of water reuse such as offloading ocean discharges. *Include information into text for Objective A to recognize that wastewater reuse integrates wastewater and water supply. *Add quantitative (AFY) target for water reuse. Note that there is already a quantitative target for reducing discharges to the ocean. *Include more information into the RMS Chapter about the value of offloading outfall, and about the City's WPDP. * Add new "Wastewater Management" RMS into the Plan and add call-out box on IBWC International WWTP. *Add information about water reuse and integrated water management into Table 1-2- this addition would provide additional points for water reuse projects in the IRWM project selection and scoring process.	Yes.
5	Metro JPA Technical Advisory Committee (TAC)	7/22/13 Email to Rosalyn	N/A	??	PLWTP, operational since 1963, treats approximately 175 million gallons of wastewater per day generated in a 450-square-mile area by more than 2.2 million residents. Remaining effluent is discharged to the Pacific Ocean through the 4.5 mile PLOO, which is 230 feet below surface. While there is a second ocean outfall located in the South Bay to serve the southern portion of the County, the PLWTP and PLOO handle a greater volume of wastewater flow. WHITE PAPER GIVEN AS A RESOURCE	See response #4 above. The new water reuse section of the Region Description (Section 3.5.5) includes information about benefits to water reuse, such as offloading ocean discharges.	Yes.
6	Metro JPA Technical Advisory Committee (TAC)	7/22/13 Email to Rosalyn	N/A	8.4.10?	Section 8.4.10 of the plan, which includes an overview of recycled municipal wastewater as a regional water management strategy, seems like the most appropriate place to incorporate a more in-depth discussion on how expanded water reuse/AWP (in addition to traditional RW for irrigation) fits within the regional water supply portfolio and offers multiple benefits closely connected with the goals of IRWM.	See response #4 above. We have included updated information about the City's WPDP into the RMS Chapter (Section 8.4.10) and creating a new RMS that focuses on wastewater management.	Yes.

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7	Lowell Grimaud, Carlsbad Resident	7/18/13 Email to Rosalyn	N/A	N/A	<p>My concern is about the lagoons, the creeks feeding them and the outlets to the oceans. With the Semptra Power dropping out of dredging of the Aqua Hedionda Lagoon (per the current plant operator, when the Desalt Plant comes on, they will not need to dredge any longer). The Lagoon Foundations find it extremely difficult to raise funds to keep the outlets and lagoon dredged.</p> <p>As you are aware, the Buena Vista Lagoon is a disaster, the outlets are blocked, the creek has become stagnant, contaminated, even caught on fire recently because of invasive plant growth. San Elijo just recently was able to obtain funding from stakeholders and others to reopen its creek/lagoon outfall to the ocean. The City of Oceanside does keep its outlet open. The City of Carlsbad and other stakeholders on the three lagoons of North county has a concern to keep the outfalls open and has benefited in the past dredging by the Power Plant by replenishing its and the State Parks Beaches.</p> <p>It is imperative that the Plan address the needs to dredge the Lagoons of North county. These Lagoons provide a recreational wonderland, act as a nursery for breeding of our local fish species. Further, our Hubbs Sea World Research Center and the Carlsbad Aqua Culture Farm greatly benefit from the dredging of the Agua Hedionda lagoon.</p> <p>It is imperative that IRWM Plan address the concerns of all Lagoons i.e. periodic dredging to keep the lagoons open to the ocean and to afford boating and other recreational and commercial uses of the watersheds.</p>	Have included general information about the importance of dredging in coastal lagoons into Section 3.8 .	Yes.
8	Jimmy Knott III, Oceanside Utilities Commission	7/11/13	N/A	N/A	<p>Would like the Water Authority to require the developers of the Gregory Canyon Landfill to permanently guarantee a pristine water supply to all authorities, agri-businesses, and homeowners who use (not just withdraw) water from the San Luis Rey River in perpetuity by indemnifying their project by putting on deposit, permanently surrendering these funds to this deposit with this amount being adjusted yearly to the CPI index for the existence of the landfill (not just the operation of it).</p> <p>The developers of the Gregory Canyon landfill project will also insure for the same amount as the deposited amount plus any predicted clean-up costs, this amount would be required to be adjusted yearly to the CPI for the existence of the landfill from any and all potential minor or catastrophic failures as well as all costs involved for replacement of water supplies.</p>	We have included more information about concerns with the Gregory Canyon Landfill into Section 5.3 (the San Luis Rey Watershed Section) of the Watershed Chapter. We have not included information about how to finance or set-up insurance contingencies for the landfill - this type of recommendation is outside of the IRWM purview.	Yes.
9	Lawrence O'Leary, CA Landscape Contractors Association	7/29/13	N/A	N/A	<p>Please keep in mind that: The IRWM Plan focuses on water savings and reducing water finding its way downstream, intentional or otherwise.</p> <p>So, who better to get the job done than an industry that represents the highest amount of water used; landscape irrigation? Currently our membership is positioned as what can be described as an accidental place at the IRWM Plan Workgroups table. Green Landscape Industry professionals are ready to act to demonstrate very large results in a short period without tremendous costs.</p>	The California Landscape Contractors Association is considered an active stakeholder in the IRWM process, and is a valued member of the RAC. For additional information on how to get involved in the process, please contact Mark Stadler, IRWM Program Manager.	No.

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10	Lawrence O'Leary, CA Landscape Contractors Association	7/29/13	N/A	N/A	For the public sector, we ask that funding be made available to upgrade schools, parks, medians and oceanfront public spaces to current smart and efficient irrigation technologies. For the private sector, funds be made available to underwrite re-designs and/or smart technologies.	Chapter 9 of the IRWM Plan includes information about how projects are prioritized for IRWM funding. To date, we have funded many public sector conservation projects that focus on smart and efficient irrigation technologies. Given that conservation projects are an economically efficient means of saving water, they generally score well in the project selection process. With regards to funding projects for the private sector, due to funding limitations placed on IRWM funding by the California Department of Water Resources, we cannot directly fund private-sector projects. A non-profit or public agency must be the project sponsor for all IRWM projects.	No.
11	Lawrence O'Leary, CA Landscape Contractors Association	7/29/13	N/A	N/A	Reducing water usage has proven to protect the waterways leading to our bays and the Pacific. How? Reducing the carried load of unwanted chemicals, waste and trash. And of course lowering our energy load from pumping water over mountains and then treating and distributing that same water is an AB32 must! Not to be forgotten is the influence our water use has on employment in the disadvantaged parts of Imperial and Kern counties.	See response to watershed comment #50. We have included a new section in the Region Description about water conservation, which includes information about the benefits of conservation - such as reducing stormwater flows.	Yes.
12	Shasta Gaughen, Pala Tribe	7/30/13	4-20	Section 4.7.3, Water Management Issues, Number 3	This item (3, Insufficient Groundwater Supply) should include a line acknowledging tribes' superior water rights and recommending some off-reservation regulation of groundwater pumping	We have combined Item 1 and Item 3 into one bullet about groundwater management; this bullet now includes information about considering reservation and non-reservation water use for proper groundwater management.	Yes.
13	Shasta Gaughen, Pala Tribe	7/30/13	4-21	Section 4.7.3, Water Management Issues, Numbers 13 and 14	These items (13 and 14, inadequate flood protection infrastructure and tribal lands in flood and inundation areas) need additional information for flood warning monitoring and data gaps in the early warning flood monitoring program	We have cross-referenced this section to Section 3.5.10 in the Region Description, which discusses early flood warning and monitoring systems that are currently in place in the County.	Yes.
14	Shasta Gaughen, Pala Tribe	7/30/13	N/A	N/A	Although we mentioned our concerns regarding the CEQA process for tribes as detailed in the IRWM Plan, it is unclear whether any steps are being taken to take up this issue at the state level. Section 4.7.3, Water Management Issues, does indicate that the CEQA requirement is a significant barrier to funding and tribal participation. We recommend that the following be added to the final sentence of the penultimate paragraph on page 4-22: "Any attempt to apply CEQA requirements to tribes is a significant barrier to funding and tribal participation in IRWM programs, since it requires tribes to give up their tribal sovereignty in order to use state funding for a project on tribal land."	Chapter 4 recognizes that the CEQA requirements are an issue for tribes (see page 4-22). We have added additional information about CEQA requirements as an implementation concern into Chapter 11, and also recognize that the RWMG has made this comment to DWR many, many times.	Yes.
15	Shasta Gaughen, Pala Tribe	7/30/13	5-19	Section 5.3, SLR Watershed, Water Systems	We think it is important to mention both tribal public water systems and their wastewater agencies alongside the larger agencies already mentioned. These public water systems may not be as large as some of the ones mentioned; however, it is important to include them since we may all be project partners in the near future. Additionally, most of the SLR Tribes have groundwater wells that serve their public water systems, and they should be mentioned in the last paragraph of this section as well.	Yes, agree that this needs to be included. We have included information about each tribe into each watershed section, and have also cross-referenced with Chapter 4 to make sure that those tribal water resources explained in Chapter 4 are also in Chapter 5.	Yes.
16	Shasta Gaughen, Pala Tribe	7/30/13	5-20	Section 5.3, SLR Watershed, Internal Boundaries and Land Uses	It would be useful to calculate the percentage of land that lies within Tribal Reservations and provide that information in this section.	Yes, we have added this percentage calculation into the watershed chapter.	Yes.

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17	Shasta Gaughen, Pala Tribe	7/30/13	5-22	Section 5.3, SLR Watershed, Management Issues and Conflicts	Issues from the central portion of the watershed (where most tribes are located) have not been adequately addressed in this section. There is a large potential for groundwater overdraft since the County's General Plan does not typically take into account Tribal development or the senior water rights of local Tribes. These plans usually only account for non-tribal development that is in the planning stages and therefore over-allocate local groundwater resources. It would be helpful to mention this challenge and bring attention to it. Additional challenges include the reduction of surface water due to water diversion, as well as an increase in the use of groundwater from increased agricultural and residential development.	See response to #15 above - tribal water resources have been incorporated throughout Chapter 5. We have included information about general planning and considering tribal developments in Chapter 4. We have not included information about the overdraft potential, because we could not find a source for this information.	No.
18	Marisa Soriano, City of Chula Vista	7/31/13	Page 8-15	Section 8.4.18	Urban runoff management is not only limited to the MS4 Copermittees, but also other agencies and business types. Suggest keeping this section more general. If it focuses on Copermittees, then the bullets need to be expanded to better encompass the activities that the Copermittees do, which is very extensive, or provide more examples.	Yes, we have modified the text to specify that it does not just apply to the MS4s.	Yes.
19	Marisa Soriano, City of Chula Vista	7/31/13	Page 10-5	Table 10-1	Data gap topic 'Receiving Water Monitoring - Representative Watershed Sampling' states that storm water programs have been sampling since 1993-94, yet there is not enough representative characterization of the quality of receiving waters within the watersheds, which would require expansion of numbers and locations of stations. Watershed priorities have been well-established by the Copermittees and other monitoring programs because of the past 20 years of monitoring done in receiving waters. It would be better to suggest that receiving water monitoring be focused in order to update Basin Plan priorities (i.e. beneficial use designations and water quality objectives) rather than assessment of water quality, which has been well-established. Special data gaps versus water quality data gaps should be better distinguished from each other.	Yes, we have included this information about water quality monitoring and clarified that the copermittees have well-established priorities.	Yes.
20	Marisa Soriano, City of Chula Vista	7/31/13		Table 10-3	Storm water monitoring programs have changed because of the 2013 Regional Storm Water Permit. Table should be updated to reflect these changes or there should be a note letting the reader know that these programs were from the 2007 Storm Water Permit.	Yes, we have modified the text to clarify that these are the old programs.	Yes.
21	General	7/30/13	N/A	N/A	Expect to receive comments/criticism that the 2013 Plan does not explicitly call out the integration of water supply and wastewater as one of the Plan objectives, or at least a major initiative of the SDIRWM.	See response #4 above.	Yes.

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22	Jill Witowski, Coastkeeper and Julie Chunn-Heer, Surfrider	7/31/13	N/A	N/A	Join the Metro Wastewater JPA in asking to see the 2013 IRWM Plan expand the discussion on the opportunity for wastewater reuse in the region and how it fits within the region's water management strategy The success of the City's WPDP and legislative progress establish wastewater reuse as a critical component of the region's future water supply. Expanding the discussion of wastewater reuse is particularly important given that the allocation of future IRWM funds will be tied to the areas advanced in the 2013 IRWM Plan.	See response #4 above.	Yes.
23	Jill Witowski, Coastkeeper and Julie Chunn-Heer, Surfrider	7/31/13	8-11	8.4.10 Recycled Municipal Wastewater	Broaden Section 8.4.10 of the IRWM Plan to include a more in-depth discussion of how expanded water reuse/advanced water purification for potable reuse fits within the regional water supply portfolio and offers multiple benefits closely connected with the goals of integrated water management	See response #4 and #6 above.	Yes.
24	Ruth Kolb and Mark Stephens, City Stormwater Department	7/30/13	2-11	Objective H Text	Add text to acknowledge that the Copermittees are responsible for developing and implementing strategies and programs to improve surface water quality\receiving water quality.	We have clarified the Copermittees' roles in Chapter 3, Region Description. We have not included this information into Chapter 2, because it would not be consistent with the information provided for other objectives.	No.
25	Ruth Kolb and Mark Stephens, City Stormwater Department	7/30/13	2-16	Table 2-2	Does the storm water project type include surface water in a broader sense, or should another column be added for surface water projects?	Yes, the stormwater project type includes surface water in a broad sense.	No.
26	Ruth Kolb and Mark Stephens, City Stormwater Department	7/30/13	2-16	Table 2-2	Need to add column for surface or receiving waters, because it is different from the other categories.	See response to comment #25 above.	No.
27	Ruth Kolb and Mark Stephens, City Stormwater Department	7/30/13	2-17	Table 2-2, Objective C, Last Metric of Target 1	Does this include NPDES or regional surface water quality monitoring data?	Yes.	No.
28	Ruth Kolb and Mark Stephens, City Stormwater Department	7/30/13	3-51	3.6.4, Stormwater Agencies	Delete the text that says, "However, given the nature of water management and jurisdictions in the Region, it is likely that the County will continue to play a central role in facilitating coordination of stormwater management." This is an assumption. This plan should state facts and not give projections.	We have revised this section to clarify that the County will continue to play a central role to ensure that regional coordination continues for stormwater management purposes. We have also included a list of all co-permittees in this section to show the number of parties involved (not just the County).	Yes.
29	Ruth Kolb and Mark Stephens, City Stormwater Department	7/30/13	N/A	Chapter 5, Watersheds	Modify the "Water Quality" section to "Water Quality Impairments"	We have expanded each water quality section to include more information about water quality so that these sections do not just focus on impairments. We have also revised the title to "Water Quality and Water Quality Impairments"	Yes.
30	Ruth Kolb and Mark Stephens, City Stormwater Department	7/30/13	N/A	Chapter 5, Watersheds	Include information about the stormwater management programs (what they include) for each watershed. Example (San Dieguito): · Urban runoff and receiving water monitoring during wet and dry weather, · Assessment of water quality trends, potential sources, and impacts, · Standards to manage runoff discharge rates and durations from all Priority Development Projects, and · Programs to prevent, control, and treat sources of pollutants such as BMPs, water conservation, public education and outreach, maintenance of streets and storm water infrastructure, inspections of pollutant generating activities.	We have included this information in Section 3.5.9 rather than repeating it for each watershed.	Yes

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31	Ruth Kolb and Mark Stephens, City Stormwater Department	7/30/13	5-49	Section 5.6, Peñasquitos	Add this text to the Management Issues and Conflicts: The landfill site at Mission Bay, which operated as a municipal landfill from 1952 to 1959, was primarily a site for municipal refuse, but records indicate some industrial waste may have been deposited there. Trace contaminants of potential concern have been discovered in groundwater, soils, and sediments, which has led to concerns regarding their impact to the environment and human health. In September 2006, the City conducted a human health and ecological risk assessment of the Mission Bay Landfill. The conclusion from this assessment reported, "The total Hazard Index (HI) for each ecological receptor was less than 1, indicating no significant likelihood of adverse terrestrial ecological effects (SCS Engineers 2006)." The City of San Diego continues to assess and perform semi-annual groundwater and surface water monitoring at the site.	We have included a revised version of the provided text into the Watershed section, and have also included additional information about stakeholder concerns.	Yes.
32	Kristen Crane, City of Poway	7/31/13	1-1	List of Challenges	Expand to include a reference to cost drivers associated with water supply diversification, wastewater treatment, regulatory compliance, and maintenance of existing infrastructure. All of these efforts are expensive; costs are passed to the rate-payers, which is burdensome, particularly during an economic downturn.	See response #4 above. Have amended the list on Page 1-1 substantially. The information has been incorporated in the introduction section.	Yes.
					Point Loma Wastewater Treatment Plant – Pressure to upgrade the plant to secondary level of treatment from chemically-enhanced primary treatment, which is extremely expensive, particularly given site constraints of Point Loma facility.		Yes.
33	Kristen Crane, City of Poway	7/31/13	3-81	Water Supply Diversification	Within this section, incorporate a discussion of expanded water reuse (advanced water purification/potable reuse) as a strategy to reduce the load to the Point Loma Wastewater Treatment Plant and to diversify the region's water supply.	See response #4 above. We have included this information in the new "Water Reuse" section.	Yes.
34	Kristen Crane, City of Poway	7/31/13	3-86	Table 3-39: Summary of Water Management Issues and Potential Conflicts	This chart should include wastewater as a "water management issue". With the following potential conflicts:	See response #4 above. We have included this information in the table titled "Summary of Water Management Issues and Potential Conflicts" (Table 3-40).	Yes.
					Regulatory pressure to upgrade Point Loma Wastewater Treatment Plant		
					Cost (for treatment plant upgrades, ongoing treatment and operations, infrastructure maintenance)		
					Regulatory pressure for wastewater operations		
35	Kristen Crane, City of Poway	7/31/13	6-10	Table 6-3: Workgroups	Seems appropriate to incorporate a workgroup focused on Wastewater into the IRWM process.	We have clarified in Table 6-3 that ad-hoc workgroups will be convened as necessary. Specific workgroups such as a wastewater group are not named.	Yes.
36	Kristen Crane, City of Poway	7/31/13	6-27	Section 6-6, Paragraph 2	Poway Public Works Department agrees with this language, "...the grant application process is quite complex and requires a significant amount of information from entities proposing projects for funding. Some potential sponsors, especially those from DACs, many non-profit organizations, and smaller public agencies, lack the technical expertise to assemble a proposal that meets all the requirements established by DWR. Moreover, the amount of information required for the actual application can be daunting and quite expensive."	We have updated information about integration in Chapter 9 to provide a balance with smaller agencies (see comment #41)	Yes.
					While well intended to ensure projects that are well-integrated and achieve many objectives using the same dollar, the resulting reality is that smaller entities are not competitive for the funding. Worthwhile projects, though less expensive, cannot successfully navigate the process.		
					Uneven distribution of grant funding – not all communities are benefitting, though everyone is paying.		

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37	Kristen Crane, City of Poway	7/31/13	8-2	Table 8-1: Resource Management Strategies Addressed in California Water Plan Update 2009	Is there a way to weave in stronger reference to the concept of expanded wastewater reuse/advanced water purification/potable reuse? Wastewater is not referenced on this list, but it should be considered as a resource management strategy.	See response #4 and #6 above.	Yes.
38	Kristen Crane, City of Poway	7/31/13	8-11	Section 8.4.10 – Recycled Municipal Wastewater	Expand this section to include more emphasis on water reuse and advanced water purification. Weave in the multiple benefits associated with reducing wastewater flows to Point Loma Wastewater Treatment Plant.	See response #4 and #6 above.	Yes.
39	Kristen Crane, City of Poway	7/31/13	8-21	Table 8-2: IRWM Plan Objectives Supported by Resource Management Strategies	Wastewater management should be incorporated as a resource management strategy.	Agree - see response #4 above.	Yes.
40	Kristen Crane, City of Poway	7/31/13	8-23	Table 8-3: Resource Management Strategies and GHG Reduction Opportunities.	Wastewater should be incorporated as a management objective. There are strong GHG reduction opportunities associated with reducing wastewater flows and increasing water reuse.	Agree - see response #4 above.	Yes.
41	Kristen Crane, City of Poway	7/31/13	9-2	Section 9.2.1 - Partnership Integration	While integration and partnerships add value, the current structure forces partnerships that may not really add value or be necessary to achieving the project objective, which ultimately makes the projects more expensive and cumbersome to complete. In a small agency, like the City of Poway, sometimes one individual is responsible for multiple functions. Whereas in a larger organization, like the City of San Diego, several large departments may oversee those individual functions. Considering these internal “partnerships” as partnership integration may be giving an unfair advantage to larger organizations where they have the ability to form those internal “partnerships” simply because the functions are bifurcated between departments or divisions. Not to say that these partnerships shouldn’t be considered, but is there a way to not discriminate against smaller organizations that don’t have the ability to form those internal partnerships?	We have clarified that simply mentioning inter-departmental coordination is not enough to be deemed as partnership integration for IRWM funding. Integration between departments must exceed general day-to-day operational efforts to receive these points.	Yes.
42	Kristen Crane, City of Poway	7/31/13	9-11	Table 9-1: Scoring Criteria for IRWM Grant Opportunities	Scoring criteria are important for objectively comparing projects. However, the weights that are used seem to overly value some areas compared to others. For example, a project that addresses more than six multiple objectives (which seems very significant and beneficial) is only assigned 4 points, which is equal to the amount to the number of points assigned to a project that benefits a disadvantaged community. Poway doesn’t have any <i>entire</i> Census tracts that qualify for the “disadvantaged community” criterion, so we are less competitive in that category. Projects that involve more than one entity are assigned four points, but there’s no subjective evaluation as to the usefulness/effectiveness of the partnership.	Thank you for the comment. The criteria and scoring are open in the IRWM Plan. Please note that in Table 9-1 of the Plan, none of the weights have been determined for the criteria (last column in the table). The Plan has been modified to further clarify that the weighting and ultimate scoring/prioritization of projects is not solidified in the 2013 IRWM Plan. During each round of funding the RWMG and RAC will be asked to approve of weighting for the criteria and assign new criteria as applicable.	Yes.

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43	Kristen Crane, City of Poway	7/31/13	4	Appendix 7-C – San Diego IRWM Land Use Planning Study – Section 1.4 - recycling and reuse of water supplies	Can this section be expanded to include a discussion of the concept of advanced water purification/potable reuse?	This deliverable (SDIRWM Land Use Planning Study) was finalized upon RAC approval in February 2013, and will not be updated as part of the 2013 IRWM Plan.	No.
44	Amanda Mathews, Ramona Resident	7/31/13	N/A	N/A	The entire San Diego County region would benefit from simultaneous invasive species eradication efforts and the sooner the better. The problem in our town has the capacity to influence invasive species prevalence in both the San Dieguito River as well as the San Diego River causing problems for the entire region down river. These invasive species may also contribute to ground water depletion in an area where many depend on ground water for both household and agricultural use.	Section 3.8 of the Region Description includes detailed information about invasive species issues in the Region. It is outside of the purview of the IRWM Plan to recommend comprehensive invasive species removal/eradication efforts.	No.
45	Garth Koller, City of San Marcos	7/31/13	3-67	Section 3.8 Stormwater Management	General: need to include Phase II Permit that was adopted - includes key stakeholders such as universities and NCTD. Should include a list.	We have comprehensively updated Section 3.5.9 (Stormwater Management) please see the revisions.	Yes.
46	Garth Koller, City of San Marcos	7/31/13	3-67	Section 3.8 Stormwater Management	First sentence on what the MS4 system is: use the legal definition of MS4 found in the permit.	We have comprehensively updated Section 3.5.9 (Stormwater Management) please see the revisions.	Yes.
47	Garth Koller, City of San Marcos	7/31/13	3-67	Section 3.8 Stormwater Management	Second paragraph: the new permit specifically identifies elimination of irrigation runoff. Sentence currently reads that the MS4s collect runoff from over-irrigation.	We have comprehensively updated Section 3.5.9 (Stormwater Management) please see the revisions.	Yes.
48	Garth Koller, City of San Marcos	7/31/13	3-67	Section 3.8 Stormwater Management	General: a key component to the MS4 permit is the Watershed Analysis requirements that allow offsite mitigation facilities (i.e. creek restoration) for water quality and hydromodification for development projects if certain criteria are met for the watershed.	We have comprehensively updated Section 3.5.9 (Stormwater Management) please see the revisions.	Yes
49	Garth Koller, City of San Marcos	7/31/13	3-68	Section 3.8 Stormwater Management	Within the description of the NNE standards - a part of this revolves around the Basin Plan WQOs and BUS, which should be reviewed to reflect more accurate uses and the IRWM should be part of the Triennial Review.	We have comprehensively updated Section 3.5.9 (Stormwater Management) please see the revisions.	Yes
50	Garth Koller, City of San Marcos	7/31/13	Appendix 7-C	Appendix 7-C – San Diego IRWM Land Use Planning Study – Key Issues Matrix, Page 3	The recommendation of "prepare a model sustainable landscape ordinance" should be revised. This has been completed per State requirements - all agencies were required to implement.	This deliverable (SDIRWM Land Use Planning Study) was finalized upon RAC approval in February 2013, and will not be updated as part of the 2013 IRWM Plan.	No.
51	Garth Koller, City of San Marcos	7/31/13	Appendix 7-C	Appendix 7-C – San Diego IRWM Land Use Planning Study – Key Issues Matrix, Page 4	The recommendation of "prepare a model stormwater management ordinance" should be revised. This has been completed by all MS4 Copermittees.	This deliverable (SDIRWM Land Use Planning Study) was finalized upon RAC approval in February 2013, and will not be updated as part of the 2013 IRWM Plan.	No.
52	Stephanie Bauer, Port of San Diego	7/31/13	N/A	Chapter 5, Watersheds	General comment for all watershed sections: Information on storm water programs, efforts, etc., is very limited. Need to add additional on stormwater program information to strengthen the "Stormwater and Flood Management Control" sections. New information would include: 1) any current regulations (i.e., MS4 permit, TMDLs, statewide construction and industrial permits) and stormwater programs; and 2) all agencies/parties involved in dealing with stormwater issues (Municipalities, Caltrans, US Navy, etc.). Heavily focused on water supply, so need to find a balance with stormwater management.	See response to comment #29 above.	Yes.

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53	Denise Landstedt, RCWD and USMW IRWM Region	7/31/13	5-11	5.2, Santa Margarita Watershed	<p>Suggest adding the following text regarding Water Management: In 1940, a Stipulated Judgment ("1940 Judgment") was issued directing the use and allocation of groundwater in the region. Although considered an adjudicated basin, specific water rights have not been assigned. In 1963, a Final Judgment and Decree was issued further defining the use of groundwater in the region, and in 1966, a Modified Final Judgment and Decree ("Fallbrook Case") was entered incorporating interlocutory judgments and the 1940 Stipulated Judgment. This document produced an Application to Appropriate Unappropriated Water to the Department of Water Resources (DWR) in the Temecula Creek, but was not fully executed until 2009 when the State Water Resources Control Board (SWRCB) issued Permit 7032 to RCWD providing water appropriations to Vail Lake.</p> <p>These judgments were followed by years of court cases and power struggles by multiple parties, including the Federal government (U.S. Marine Corps Camp Pendleton) over water use in the watershed basins, citing the judgments did not fully meet the needs of the parties for effective water management. Finally, after many years, a settlement agreement, "Cooperative Water Resource Management Agreement between Camp Pendleton and Rancho California Water District", was reached and executed in March 2002. This agreement supersedes the previous judgments (1940 Judgment and Fallbrook Case) and remains in place today to govern water flow in the Santa Margarita River and use of the Murrieta- Temecula Basin.</p> <p>The Watermaster prepares the "Santa Margarita Watershed Annual Watermaster Report", providing annual reporting of water conditions in the watershed, but does not manage the groundwater basin. The Court has retained jurisdiction over all surface flows of the Santa Margarita River Watershed and all underground waters determined by the Court to be subsurface flow of streams or creeks or which is determined by the Court to add to, support or contribute to the Santa Margarita River stream system. Local vagrant groundwaters that do not support the Santa Margarita River stream system are outside the Court jurisdiction.</p>	See comment #29 in the watershed chapter - reviewed this text with other relevant parties and have modified accordingly.	Yes.
54	Denise Landstedt, RCWD and USMW IRWM Region	8/2/13	5-12	Section 5.2, Santa Margarita Watershed, Water Quality	Add this text (red is new black is existing): "There is concern that imported water upstream is contributing to increased levels of salts through the lower Santa Margarita Watershed (County of San Diego, 2005). RCWD is preparing a salt and nutrient management plan in accordance with the State's Recycled Water Policy to address the issue, which may result in potential Basin Plan amendments, and mitigation measures for the future control of salinity in the Basin, benefiting the Lower Santa Margarita Watershed. "	Yes, have included this information with some minor text revisions	Yes.
55	Denise Landstedt, RCWD and USMW IRWM Region	8/2/13	5-14	Section 5.2, Santa Margarita Watershed, Management Issues and Conflicts	This information is completely out-of-date relative to the "issues" between RCWD and Pendleton. The whole paragraph needs to be re-stated to discuss the "Cooperative Water Resource Management Agreement" (CWRMA) between RCWD and Pendleton and the Watermaster activities, and stress the cooperative efforts on a whole host of issues dealing with SMR water quality and quantity. Please use information provided previously (see comment #53) to update this section.	Yes, have updated this section with information from RCWD.	Yes

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56	Arne Sandvik, Padre Dam	8/5/13	4-20	Section 4.7.3, Paragraph 2, Water from Water Agencies, second sentence	Text states..." Retail agency supplies are expensive and treat tribes as customers rather than the sovereign governments that they are." Padre Dam MWD does not agree with the above statement. Padre Dam MWD strives to work cooperatively with all of its customers including Tribal sovereign governments. Padre is currently working on a water service agreement with the neighboring Viejas Tribe. The price of retail water is largely affected by the cost of wholesale water. The cost of retail water is irrelevant as Tribes could obtain their imported water from wholesalers. Replace the quoted sentence with the following..."The majority of retail agency supplies are imported through their wholesale water agencies. State law prevents retail water agencies from waiving wholesale water agency annexation requirements even to sovereign entities such as tribes. Additionally, many tribes have viewed the requirement to annex as an infringement on their sovereign rights. Where tribes can locate alternative supplies, local retail agencies can be instrumental in assisting the tribes with delivery through wheeling or other similar agreements."	Agree that the language is strong - we have edited the text and incorporated a modified version of the recommended text.	Yes.
57	Arne Sandvik, Padre Dam	8/5/13	5-53	Section 5.7, San Diego Watershed, third paragraph, first sentence	Text states..... "The California Supreme Court decreed in 1930 that the City has Pueblo Water Rights to all of the water (surface and underground) of the San Diego River including its tributaries, from its source to its mouth." The above sentence should be revised to also recognize the right of water importer (retail water agencies). Although the City of San Diego owns the Pueblo Rights within San Diego river basin, retail agencies within the basin that import water into their service area have the legal right to recover the return flows from imported water and recycled water for the beneficial use of their customers. The San Diego region imports approximately 500,000 acre-foot per year of water and a significant amount of return flow contribute to water resources within the region. Please add the following sentence to the above quoted text: "Subsequent California Supreme Court decisions clarified that retail agencies importing water into a basin have a right to recover return flows of that water that supersedes the Pueblo Water Right."	We have revised the text to reflect the fact that water rights within the basin are complex. Court cases are not appropriate to reference in the IRWM Plan for this issue.	Yes
58	Arne Sandvik, Padre Dam	8/5/13	5-55	Section 5.7, San Diego Watershed, Water Systems, first paragraph, second sentence	Text states....." Imported water is brought into the region by massive aqueduct systems from the Colorado River (approximately 240 miles away) and from the State Water Project carrying water from the Sacramento-San Joaquin Bay Delta (approximately 700 miles away) (SWA (a), 2012)." Add this sentence following the above sentence..."The imported water that is applied to the land as irrigation water (for agriculture and domestic irrigation) contributes significantly to the groundwater supply in the form of return flow and is a valuable resources for all CWA member agencies that have usable aquifers."	We have edited the text and incorporated a modified version of the recommended text.	Yes
59	Arne Sandvik, Padre Dam	8/5/13	5-56	Section 5.7, San Diego Watershed, Water Systems, top paragraph, last sentence	Text states..."The Santee-El Monte Basin is a subset of the San Diego River Valley groundwater basin; although this basin is currently being studied by the United States Bureau of Reclamation, it is not officially defined by DWR. The Santee Basin is defined in the San Diego Basin Plan as Basin Number 7.12 which includes the Santee-El Monte Basin.. It is also included in the Metropolitan Water District of Southern California's 2007 Groundwater Assessment Study. Please revise text to either remove the reference to the basin's absence from DWR Bulletin 118, or include the fact that it is covered by both the MET study and the San Diego Basin Plan.	We have edited the text and incorporated a modified version of the recommended text.	Yes.

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60	Arne Sandvik, Padre Dam	8/5/13	5-56	Section 5.7, San Diego Watershed, Water Systems, third paragraph, third sentence	Text states "Now, recharge of the groundwater basin occurs from dam releases and underflow below the dam." The major source of recharge for the groundwater basin downstream of the Dam is via return flow from applied imported water and recycled water. Add this source as a major recharge contributor. With the raising of the San Vicente Dam, release from the dams will be an unlikely occurrence. Almost all underflow below the dam is extracted by users from the upper and lower Santee-El Monte basin (e.g. Lakeside Water District).	We have edited the text and incorporated a modified version of the recommended text.	Yes
61	Arne Sandvik, Padre Dam	8/5/13	5-56	Section 5.7, San Diego Watershed, Water Systems, last 6 sentences	Revise as follows: In Santee, the alluvium thickness is limited, ranging from less than 10 feet to approximately 30 150 feet. Helix Water District studied the <u>upper</u> Santee-El Monte Basin with the intent to use the basin for groundwater recharge with recycled water, but decided not to proceed with the project. Padre Dam Municipal Water District is currently studying the <u>lower</u> Santee-El Monte Basin for groundwater recharge with recycled water and is preparing a salt and nutrient management plan for the basin. <u>Padre Dam Municipal Water District also has interest in recovering return flows from applied imported water and recycled water.</u> The City of San Diego has Pueblo rights to the natural underlying groundwater <u>however pursuant to California law unless the City is actively putting that water to beneficial use it cannot prevent other agencies from tapping the supply.</u> For example, under agreement with the City of San Diego, Lakeside Water District currently uses approximately 700 AFY from the <u>mid</u> Santee-El Monte Basin. The <u>water from</u> Lakeside Water District's wells <u>is</u> treated to remove iron and manganese (Lakeside Water District, 2011).	We have edited the text and incorporated a modified version of the recommended text.	Yes
62	Arne Sandvik, Padre Dam	8/5/13	5-61	Section 5.7, San Diego Watershed, Management Issues and Conflicts, third paragraph	Revise paragraph as follows: Padre Dam Municipal Water District is interested in using the <u>lower</u> Santee-El Monte Basin for groundwater recharge with <u>full, advanced treated water.</u> <u>Padre Dam Municipal Water District also has interest in recovering return flows from application of imported water and recycled water by its customers.</u> The City of San Diego also maintains an interest in the basin due to their Pueblo rights in the San Diego River and associated groundwater basins. These agencies will need to coordinate to ensure maximum use of the groundwater basin, while at the same time ensuring protection of <u>historical</u> water rights."	We have edited the text and incorporated a modified version of the recommended text.	Yes
63	Linda Flournoy	8/5/13	N/A	General	Can we replace the term "economies of scale" with "economies of scope"? Economies of scale implies making things larger to reduce costs, where economies of scope means fully integrating solutions into one comprehensive action that will resolve issues at a lower overall cost. The latter is true integration and what the IRWM Plan is about.	Yes, we have included information about economies of scale and scope.	Yes.
64	Linda Flournoy	8/5/13	2-3	Section 2.3, Sustainability of Water Resources	Can we add information about the precautionary principle into the definition of sustainability? There is a concern that the document has a lot of emphasis on basing decisions on scientific/technical data. The precautionary principle states that it is not necessary to wait for full scientific consensus to make a decision.	We are not going to include this per se, because scientific caution has been an important part of the Plan. However, we have included further information about no-regret climate change strategies.	Yes.
65	Linda Flournoy	8/5/13	N/A	General	I think it would be important to give a detailed sub-section and diagram, near the front, on the Water Cycle/Circle, just to bring everyone to the same starting place. This is, after all, the thing we are ultimately trying to integrate regionally, through our management strategies, but we all get lost in our own specialty and have trouble seeing the water-forest for the trees.	We have included an updated "modern water cycle" graphic in the introduction to guide readers.	Yes

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66	Linda Flournoy	8/5/13	N/A	General	I think there is a function/step in this Cycle which is unacknowledged and which is the first place where water becomes a problem. That is, we are missing, we have disrupted, the point of *opportunity* to "capture and infiltrate rainwater in the sq. ft. where it lands", that is, before it "runs" off, before it is consolidated with other drops to become difficult to manage volumes of stormwater and floodwater. Practically every square foot of soil can manage effectively the quart to gallon, in fact 2-3 times that much, of water that falls during runoff-level storms, IF the surface will let it in. And that is easier to change than people think. It has become my opinion, reading the Plan, that if we were to come up with a new term for this missing function, the "capturing and infiltrating of rainwater in the sq. ft. where it lands", that perhaps we could inspire professionals and stakeholders to consider it in their planning, strategies and projects.	We have included information about infiltration and capturing stormwater into Section 3, Region Description.	Yes.
67	Linda Flournoy	8/5/13	N/A	General	Focus on outdoor water use and the need to effectively manage water (see comment #66) above.	We have included this information into the new section on conservation(Section 3.5.8).	Yes.
68	Linda Flournoy	8/5/13	N/A	General	Please do not continue to perpetuate this Myth. ("San Diego only gets 10" of rain and is a Desert") It may be true for the southern coastal edge of The City of SD to I.B. (1%?), but people hear it as referring to the whole County. The unfortunate result I'm hearing is <i>not</i> that rain is considered precious, but rather it is devalued altogether! Pretty sure that wasn't the intended result. An accurate Regional description is important, I think, as most readers will not research our assertions. To consider how important it is to our Regional future: The Precipitation Map (p3-8, thank you) shows that on just the <i>developed</i> land of the Region (~1500 sq. mi.), there falls, in a poor year, ~1 MAF per year (nearly 2x our current demand). A good year is about 1.5 MAF. Most of it must be expensively managed as stormwater due to disruption of the natural water cycle. Pre-development, most of it infiltrated. In my engineering opinion, much of this water is economically usable. If we're going to innovate (bullet 3), let's value the clean free rain that is falling here already...	Yes, we have updated to clarify the rainfall differences between the inland and the coastal areas.	Yes.
69	Linda Flournoy	8/5/13	1-2	Section 1.2 Plan Overview, Purpose of the Plan, Bullet #6	I like to think we are setting out to Integrate the whole Water System, not just water strategies or management... How about: "identifies opportunities for integrating the whole regional water system, repairing our local Water Cycle, starting by integrating regional water supply, water quality and watershed management strategies"	Ok, have updated this bullet.	Yes.
70	Linda Flournoy	8/5/13	N/A	General	For consistency, possibly consider carrying on with the 4 W's; marking each Section or Meta-Section with the phrase at the top?	We are not going to include this into the document.	No.
71	Linda Flournoy	8/5/13	1-6	Table 1-1, Summary of Water Management Responsibilities for RWMG	If County manages Stormwater, is it appropriate to give solid dot for LID (Low Impact Development) at line 5: "Capturing and Storing Local Runoff", since infiltrating into soil, if done well, is the least expensive and most beneficial form of storage?	Ok, we will include this. However, the dot will be hollow (indirect) to reflect the fact that the County itself does not do those actions.	Yes.
72	Linda Flournoy	8/5/13	1-8	SDCWA, first paragraph, last sentence	I felt some small confusion. Add one of these?: "... support an annual regional? water? economy of..."	Ok, we have revised to clarify.	Yes.

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73	Linda Flournoy	8/5/13	1-9	City, third paragraph regarding wastewater	This is somewhat confusing. Are you saying this is 2 systems or an interconnected system? Does the first also have a name? Would a map help? AND, next page, paragraph 1: is County wastewater treatment fully separate from City?	We have clarified the Region's wastewater system (Metro JPA and other) in Chapter 3, Region Description. Please see revised figures and text.	Yes.
74	Linda Flournoy	8/5/13	1-12	Description of Table 1-2, "Challenges to Water Management..."	"...summarizes several key challenges..." to indicate we may not know them all yet and welcome input. Add into the second sentence of the second paragraph, "...This current list of..."	Ok, we have made these edits.	Yes.
75	Linda Flournoy	8/5/13	1-12	Second paragraph, third sentence	"Given the importance of the challenges presented in Table 1-2, the Region will strive to implement projects to which will synchronize and address..."	No, we have not incorporated this edit. This is not what is meant in the sentence, so it is being left as is.	No.
76	Linda Flournoy	8/5/13	1-13	Table 1-2, Item 1, Left Column, last sentence	"Specifically, current regulations may be infeasible to implement from a cost and technology perspective, and implementation requirements may not yield desired benefits, or may create unanticipated or ignored dis-benefits. "	Ok, we have made edits with some minor language revisions.	Yes.
77	Linda Flournoy	8/5/13	1-13	Table 1-2, Item 2, Left Column, first sentence	"There is widespread concern that beneficial uses are not properly defined, interlinked or long-term interactions and synchronicities understood "	No, we have not incorporated this edit. For brevity we are not add in this information.	No.
78	Linda Flournoy	8/5/13	1-13	Table 1-2, Item 2, Right Column, first and second sentences.	"The IRWM Program provides a forum for collaboration between water managers, and the regulatory agencies which establish water quality standards and other stakeholders , including potentially redefining beneficial uses. The IRWM Program provides a forum through which regulated entities, non-governmental organizations, and others can collaborate on potential win-win solutions to current issues associated with water quality objectives and beneficial uses."	Ok, we have incorporated these edits.	Yes.
79	Linda Flournoy	8/5/13	1-14	Table 1-2, Item 6, Right Column, Second Sentence	"The Region's prioritization process specifically takes long-term, triple bottom line cost effectiveness into consideration when evaluating projects and the online project database that has been developed for the IRWM Program can also increase cost-effectiveness by allowing stakeholders to learn about similar projects, and potentially collaborate or coordinate efforts with other entities to replicate duplicative or redundant projects, and increase identification of cost-saving synchronicities in multi benefit, multi-disciplinary projects " Make into 2 sentences? Finally, find a place to add that "For best chance for significant cost and time savings to be realized, projects should be at less than 30% Design when coming to IRWM Project Integration Workshops, so that faster, easier and more effective coordination may occur."	Ok, we have made the addition regarding the triple-bottom line. WE have not included information about needing to be at 30% design - this is not necessarily appropriate for the IRWM Program to suggest given the varied nature of projects. We do not want to limit potentially beneficial projects.	Yes.
80	Linda Flournoy	8/5/13	1-14	Table 1-2, Item 9, Right Column, Second Sentence	Add: "Also, effective public outreach may impact political decision-making."	Ok, we have incorporated these edits.	Yes.
81	Linda Flournoy	8/5/13	1-16	First bullet, first sentence (RAC description)	Add "sustainability," Sustainability is not an environmental group; it is a dynamic state supporting the long-term symbiotic function of the System as a whole, and the health of all its members. (It's just that environment & social justice have gotten short thrift over the centuries.)	No, we are not including this in the list as not each and every RAC area has been specifically identified.	No.
82	Linda Flournoy	8/5/13	2-3	Section 2.3, second paragraph, third sentence	Add to list: "effective integrated use of available resources," or some-such to indicate minimization of wastes, especially not wasting the rainfall we <i>do</i> get. And "...materials, construction, and operations and maintenance and decommissioning."	Ok, we have made edits with some minor language revisions.	Yes.

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83	Linda Flournoy	8/5/13	2-5	Call-out box for Objective A	"6. <i>Synthesis</i> : Identifying and utilizing multiple inter-related system functions that increase the beneficial impacts and reduce the costs and unanticipated negative impacts had the functions been addressed separately. Addressing root causes, not just symptoms. 7. <i>Sustainability</i> : ... " [not just hydrology, though that is the foundation of the system we are serving]	We are not including this addition - the synthesis concept is included within Hydrology.	No.
84	Linda Flournoy	8/5/13	2-6	Top box, left column, last bullet	"... integrate with another project concept; <i>though integration in early or pre-design produces better win-win and more features possible.</i> " (if not here, then somewhere effective)	Ok, we have made edits with some minor language revisions.	Yes.
85	Linda Flournoy	8/5/13	2-6	Top box, right column, last bullet	Add: "...Integration and more upfront planning can reduce overall costs & time to completion of actual project" [not counting grant administration itself]	We have not included this addition.	No.
86	Linda Flournoy	8/5/13	2-6	Second paragraph, first sentence	"Stakeholder involvement is a vital part of the IRWM Program, and is necessary to identify and address public interests and perceptions, address stakeholder questions and issues upfront, ensure that the 2013 IRWM Plan and projects are consistent with public interests, and provide for public ownership and support of IRWM activities, <i>and bring diverse viewpoints to improve the next Plan Update.</i> "	Ok, we have made edits with some minor language revisions.	Yes.
87	Linda Flournoy	8/5/13	2-8	Third paragraph, First Sentence	"... economies of scale, <i>economies of scope (the economic rationale for integrating),</i> and the increased..."	Ok, we have made edits with some minor language revisions.	Yes.
88	Linda Flournoy	8/5/13	2-8	Objective E Call-Out Box, Second Sentence	Add to mix: "Rainfall capture and infiltration in the square foot where it falls." That is, before it "runs" off, before it becomes consolidated with other raindrops to become large, difficult to handle volumes of "stormwater". Roads and infrastructure are their own issue, but normal development and maintenance processes render the majority of San Diego region lands also functionally impermeable. We need a new term for this. Perhaps <i>acknowledging</i>	We have not included this information into Chapter 2, but we have revised Chapter 3 to ensure that infiltration is taken into consideration with these types of projects.	No.
89	Linda Flournoy	8/5/13	2-9	Second Paragraph, Last Sentence	Objective E aims to support the Region's water supply diversification efforts as well as the Region's conservation efforts, which will <i>both</i> help to <i>increase use and reduce waste of local rainfall</i> , increase water supply reliability, and reduce demands on imported water supplies	We have not incorporated this edit - again, the reuse of water via infiltration and other methods is already included.	No.
90	Linda Flournoy	8/5/13	2-9	Objective F Call-Out Box	Description in Box of Obj F seems to reduce the title phrase (more inclusive) to a water *supply* infrastructure. I notice if I add " <i>collection</i> " before "conveyance", it seems to open it up a bit. If " <i>management</i> " is added before "infrastructure" as above, then it is more inclusive, too. "Mix" also seems to imply Supply, but the point is that ALL water is supply to something. Like in nature: in complete cyclic systems, there is no waste...	We have not included these edits - the description of the objective was comprehensively updated by the workgroup, and we believe it is inclusive of the relevant issues.	No.
91	Linda Flournoy	8/5/13	2-9	Third paragraph, last sentence	Somewhere we need phrase: "utilize natural infrastructure* and mimic natural infrastructure functions**" ...*such as water transport and cleaning through sub-soils **such as wetland wastewater treatment (Living Machines, Dr. John Todd)	We have included this information associated with Objective G.	Yes.
92	Linda Flournoy	8/5/13	2-10	Objective G Callout Box	"... reduce negative effects on <i>receiving systems like</i> natural stream systems, <i>groundwater systems</i> , local water supply reservoirs, <i>and lagoons, bays and ocean.</i> "	Ok, we have made edits with some minor language revisions.	Yes.
93	Linda Flournoy	8/5/13	2-10	First paragraph, second sentence	"Sediment pollution, erosion, and reduced geotechnical, soil food web and urban habitat function are all compaction-related development impacts. These and other surface-transport <i>issues</i> have impacted water quality and hydromodification, which in turn impacts the Region's receiving waters."	Ok, we have made edits with some minor language revisions.	Yes.
94	Linda Flournoy	8/5/13	2-10	Second paragraph, second sentence	"Development <i>practices</i> (not development per se)... <i>has</i> have <i>dramatically decreased normal, distributed, at-source infiltration and therefore</i> increased the volume and duration of stormwater runoff due to the increased amount of impermeable surfaces, such as paved areas and roofs."	Ok, we have made edits with some minor language revisions.	Yes

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95	Linda Flournoy	8/5/13	2-10	Objective G	Would like to take a stab at rewriting the Discussion of Objective G from a forensic engineering perspective. Like doctoring, symptoms may need expensive emergency attention, but successful long-term treatment focuses on the cause(s) of the symptoms, not continuous treatment of the symptoms themselves. Basically, erosion, sediment transport, flooding and other hydromodification, and water quality impacts are all symptoms of a single set of development assumptions and practices – not of development per se. Many current water management practices are formulated around responding to the symptoms, which is costly and creates their own set of impacts, rather than addressing the root causes. (For example, the Army Corps of Engineers determined that it costs 2-3 orders of magnitude more to respond to flood damage rather than prepare for it. Likewise, it costs 2-3 orders of magnitude less to reduce/prevent floods than to prepare for their impacts.) Additionally, the same changes to development design and construction practices could contribute to improvement and meeting many IRWM targets – see list below	Have included information about development practices. Did not receive a re-write to include.	No.
96	Linda Flournoy	8/5/13	2-13	Objective K	Throughout this sub-section, please change focus and order of discussion to Mitigation first, then Adaptation. Ensuring that all IRWM projects address GHG impacts to the maximum extent possible will help lessen degree of risk and uncertainty for adaptation planning, and will set an example for others. If GHG's are not addressed because of short-term economics, adaptations will be insufficient and the longer-term economics will be MUCH higher, possibly crippling. Design must plan for energy/water/materials efficiencies from the very beginning; slapping it on later is what either kills projects, or the improvements. We are already at 400ppm CO2; and the last time that occurred, sea level was some 65 feet higher. Environmental tipping points create runaway accelerations in undesirable impacts. Terms such as maximum practicable and economically feasible, while appealing to share holders, historically result in very small improvements of a few percent. This is truly fool hardy. Consider it an investment in the future. A final question: at what elevation is the desal plant? Is it designed to withstand storm surges or long-term partial submergence?	This objective was comprehensively created through two directed workgroups (climate change and priorities and metrics). We have not modified the objective in its entirety, but have changed some of the language to address concerns.	Yes.

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97	Linda Flournoy	8/5/13	2-16 on	Table 2-2: IRWM Objectives, Targets, and Metrics	Returning to normal infiltration can help reach the following targets: D- 2,3,4,5,6,7 E- 1,2,4,5,6 F - 2,3,4,5 G- 1,2,3 H- 1,3,5,7 I - 1 J - 1,3 K- 1,2,3,	Ok - thank you for the input. We have included information about infiltration through stormwater capture and infiltration metrics and targets.	No.
98	Linda Flournoy	8/5/13	3-6	Table 3-6: Existing and Projected Land Use within the County.	Separate out Military and Ag – skews perceptions of change. Does anyone have #s on Urban, Sub-urban, Rural acres? Impermeable/Permeable?	See response to comment #2. We have modified this data as best as we could given the raw data source.	No.
99	Linda Flournoy	8/5/13	3-6 and 3-7	Top of page 3-6, and middle of page 3-7: agricultural paragraphs	Both locations add discussion of increase in “ distributed agriculture ”: e.g., community gardens, organic farms, edible landscapes . All have beneficial impacts on water supply and water quality, as well as increasing food security.	This is not an appropriate addition - the edits were not incorporated.	No.
100	Linda Flournoy	8/5/13	3-7 and 3-9	Second to last paragraph on 3-7 and last paragraph on 3-9	“...10” per year on the south end coast, 15” at north end coast, up to 21” on inland developed areas , and in excess...” Mention 2 (3) types: Alaskan Flow (winter big cold steady from NW) Hawaiian Flow (summer warm humid fast T-storms sporadic heavy showers tropical from wsw or desert/hurricane (Mexican tropical) from sse or ssw) Recent/ likely Future precip less Alaskan, but more Tropical (possible range to 17% increase avg)	See comment/response to #68	No.
101	Linda Flournoy	8/5/13	3-23	Last sentence at the bottom of the page	Add: “ Recreation uses pose the biggest threat to overdrafting and aquifer collapse, and also biggest opportunity for water efficiency and conservation. ”	We do not have a source for this assertion, so it was not included.	No.
102	Linda Flournoy	8/5/13	3-31 to 3-36	Section 3.5.3 Surface Water Resources	I have several edits to this section (tied to the subsurface flow points we discussed on the phone) which separate and incorporate above surface flows (commonly measured) and sub-channel flows and their behaviors in dry weather. Also, surfacing groundwater (SG) is a seasonal year-round natural phenomenon, which can, in lower reaches, be increased by urban flow, leaks etc. However, SG should not be considered with urban and ag runoff as impacting seasonal nature of aquatic and riparian habitats. In fact, natural SG <i>IS</i> the only survival system in the summer for those aquatic and riparian habitats. There are also impacts to the lagoons for not valuing subsurface flows e.g. using giant earthmovers, which compact lagoon soils, affecting, even destroying flow paths necessary for lagoon function.	Have included information into the new greywater section (part of Section 3.5.8) about this resource.	Yes
103	Linda Flournoy	8/5/13	N/A	3.7.4 Groundwater Quality, 3.8 Stormwater Management, 3.9 Flood Management	All these sections contain editorial discussions of the relationship and changes that occur when normal infiltration is blocked and the benefit of (non-concentrated) sub-surface flows when it is normal infiltration is returned. Include more information in alignment with other changes on this topic.	See comment #102 above	Yes

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1	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	3-1	Second sentence in second to last paragraph	"Caucasians represent the only ethnic group for which a population decrease is forecasted". Per table 3-1, the population of Caucasians is actually expected to increase, but because the population of other ethnicities increases at a faster rate, the percentage of the population represented by Caucasians decreases over time.	Revised language on Page 3-1 to clarify confusion about the numbers presented on population and growth rates, etc.	Yes.
2	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	3-4	Last sentence of first paragraph	"Less than 10% of the adult population did not graduate from high school." Per Table 3-3, this should read "Less than 15%...", or replace "graduate from" with "attend".	Yes, have made this revision	Yes.
3	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	3-4	Table 3-5: Existing and Projected Housing.	Footnote 2 appears in the "2008" column, but appears to address data presented in the "2030" column; suggest revising	Yes, have made this revision	Yes.
4	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	3-5	Figure 3-2: Land Use.	Suggest modifying title or adding footnote to specify the year represented by the figure.	We have clarified the source of the data on the figure.	Yes.
5	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	3-27	Figure 3-5: Regional Water Supply Infrastructure.	The location of the McCollum Water Treatment Plant (OMWD) is shown on the figure, but unlabeled.	Yes, have made this revision	Yes.
6	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	3-29	Table 3-14: Potable Water Treatment Facilities.	While the table indicates both the Badger and Escondido/Vista Water Treatment Plants are connected to the aqueduct, footnotes 4 and 5 are inconsistent. Footnote 4, which is attributable to the Escondido/Vista Water Treatment Plant, does not mention access to imported water, while footnote 5 (for Badger and McCollum) does.	Yes, have made this revision	Yes.
7	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	3-28	Table 3-13: Principal Storage Water Reservoirs	Olivenhain and San Dieguito Reservoirs are listed in the San Dieguito Watershed, but are physically located in the Carlsbad Watershed. Lake Henshaw's capacity is listed at 51,744 acre-feet; the capacity should be listed as 51,774 acre-feet.	Yes, have made this revision	Yes.
8	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	3-29	Table 3-14: Potable Water Treatment Facilities	In footnote 4, only Lake Henshaw is in the San Luis Rey River Watershed; both Lakes Wohlford and Dixon (the later which is not mentioned but is the principle source of supply for Escondido/Vista WTP) are in the Carlsbad Watershed. Also, in footnote 5, Lake Hodges is incorrectly identified as being in the San Diego River Watershed; it should read the San Dieguito River Watershed. Finally, footnote 5 describes both Badger and McCollum WTP's; while both receive local water from Lake Hodges, Badger also treats water from the San Dieguito Reservoir, while McCollum treats water from Olivenhain Reservoir, both of which are in the Carlsbad Watershed.	Have modified footnotes and table accordingly.	Yes.
9	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	3-48	last sentence of second paragraph	"Valley Irrigation District" should read "Vista Irrigation District".	Yes, have made this revision	Yes.
10	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	4-7	third line from bottom of page	missing period after "reservation lands".	Yes, have made this revision	Yes.
11	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	4-15	second to last sentence in first paragraph	Lake Wohlford is a storage reservoir for Vista Irrigation District." Should read "...a storage reservoir for the City of Escondido."	Yes, have made this revision	Yes.

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12	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	5-18	Figure: San Luis Rey Watershed.	The purple highlight for "Impaired Water Bodies (303(d) List)" does not reflect the Keys Creek and San Luis Rey River (upper) listings described under "Water Quality" on page 5-20.	We revised the 303(d) listings on the map, and ensure that they are consistent with the listings presented in the text.	Yes
13	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	5-20	third line from bottom of page	SLR drainage area mistakenly reported as 1168 sq. miles; in other places it is (accurately, I believe) reported as 558 sq. miles. Also, the reported 100 year peak discharge rates are suspicious: 22,911 cfs for Keys Creek (31.6 sq. mi drainage) but only 560 cfs for the San Luis Rey River (558 sq. mile drainage), which presumably receives the Keys Creek flood event.	Yes, have made this revision	Yes.
14	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	5-28 and 5-29		Suggest adding Olivenhain Reservoir to the map of the Carlsbad Watershed, and listing both Olivenhain and San Dieguito Reservoirs in the bullet list of "Major Surface Water Bodies" in the Hydrology section on page 5-29. Also, there is an inconsistency in where reservoirs are listed in watershed descriptions. Sometimes they appear under "Hydrology" (as in the Carlsbad Watershed), sometimes under "Water Systems" (as in the San Dieguito Watershed).	Yes, have made this revision	Yes
15	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	5-37	"Water Systems" description of the San Dieguito Watershed	Olivenhain and San Dieguito Reservoirs are incorrectly listed as part of the San Dieguito Watershed – they are physically located in (and drain to) the Carlsbad Watershed.	Yes, have made this revision	Yes.
16	Don Smith, Vista Irrigation District	7/19/13 Email to Rosalyn	7-6	Table 7-3: Summary of San Diego Region Water Supply Plans	It appears that footnote 5, which appears next to every water agency except for Sweetwater, is incorrect. As written, it would only apply to Sweetwater. It appears that the correct footnote 5 was omitted and the current footnote 5 should be footnote 6.	Yes, have made this revision.	Yes.
17	Isabelle Kay, UCSD Natural Reserve System	7/16/2013 Email to Rosalyn	5-29	Chapter 5, Carlsbad Watershed	The document states that, "The Maerle Dam Reservoir (previously the Squires Dam) receives flows from Agua Hedionda Creek..." This is completely incorrect, as the reservoir is several hundred feet above the creek. Water flows out of the reservoir into the creek, when it is released. I believe that the reservoir is stocked with water from the CWA, through the actions of the Vista Irrigation District.	Yes, have made revision.	Yes.
18	Brian Olney, Helix Water District	7/23/13 Email to Rosalyn	5-55	Chapter 5 - San Diego River - Water Systems	At the watershed workshop meeting, comments were made to correct the description of Cuyamaca Reservoir owned by Helix Water District. It is currently listed as receiving surface water and imported water. This is incorrect. It should be listed that it is only surface water.	Yes, have made this revision.	Yes.
19	Joey Randall, OMWD	7/23/13 Email to Rosalyn	3-28	Table 3-13: Principal Storage Water Reservoirs	The Olivenhain Reservoir is listed as being located in the San Dieguito Watershed. It actually resides within the Carlsbad HU (it is right on the boarder).	Yes, have made this revision.	Yes
20	Ligeia Heagy, City of Vista	7/23/13 Email to Rosalyn	N/A	Chapter 5, Carlsbad Watershed	I didn't see the Agua Hedionda Watershed Management Plan that was completed in 2008 on the list of references for the Carlsbad Watershed. This plan included participation from, really all stakeholders in the AH sub-watershed. REFERENCES PROVIDED.	We used the Agua Hedionda WMP in the analysis, and will include the plan into the references list.	Yes.
21	Mike Thornton, SEJPA	7/24/13 Email to Rosalyn	3-49	Section 3.6.3, Wastewater Agencies	This section states that OMWD is party to the San Elijo Ocean Outfall. Actually, the outfall is only owned by SEJPA and Escondido.	Have made change that SEJPA and Escondido own the outfall	Yes

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22	Nadine Scott, RCD of Greater San Diego	7/9/13 Email to Rosalyn	5-2	Figure 5-1	Maps need to adequately show the Highway 76 all the way to the I-15.	Yes, have made this revision.	No.
23	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Can we have a copy of the Watershed Workshop Presentation?	Yes. Please visit www.sdirwmp.org	No.
24	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	Chapter 4	Appreciate the re-write of the Tribal Chapter (Chapter 4). It is much better!	N/A	No.
25	Meeting attendee	7/11/ Watershed 1/ Verbal	Page 4-19	Section 4.7.2 Waters of the San Luis Rey River and Colorado River	Characterization of 5-party litigation is ok	N/A	No.
26	Meeting attendee	7/11/ Watershed 1/ Verbal	5-21	Chapter 5 - San Luis Rey Watershed - Natural Resources	In the North County Multiple Species Conservation Plan (MSCP) , the San Luis Rey is one of the main focal points: is this included?	Yes, MSCP is included.	No.
27	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Will IRWM address Salt and Nutrient Management Plan (SNMP) requirements?	Yes, the SNMP requirements and relevant SNMPs in the San Diego IRWM Region are described in Chapter 7, Section 7.5 .	No.
28	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Who is responsible for developing SNMPs?	Information is provided in Chapter 7 - the Plan has been updated to describe that as per the Recycled Water Policy, those stakeholders with a vested interest in groundwater are responsible.	Yes.
29	Meeting attendee	7/11/ Watershed 1/ Verbal	5-22	Chapter 5 - San Luis Rey Watershed - Mgmt. Issues	In addition to the mention of damming and diversions, please include information about sand blockage and the need for sand replenishment.	This information is in the IRWM Plan.	No.
30	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Please mention the conjunctive use project that is being implemented on the Santa Margarita River by the Fallbrook Public Utilities District and Camp Pendleton.	Yes, have made this revision.	Yes.
31	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Is the San Luis Rey Watershed Council included as a stakeholder group?	Yes, the council is acknowledged in Chapter 5 (Watersheds) and Chapter 6 (Stakeholder Involvement).	No.
32	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	Is it indicated that part of the City of Oceanside lies in the Carlsbad Watershed?	Yes, this information is included in the Carlsbad Watershed section of the Watershed Chapter (Chapter 5).	No.
33	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	You mentioned conjunctive use between Pendleton and Fallbrook Public Utilities District, but the US Bureau of Reclamation is also included in this effort.	Yes, have made sure that the US Bureau of Reclamation is included when discussing the Santa Margarita River conjunctive use project.	Yes.
34	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	You mentioned the SNMPs that were occurring in the Region. Are these discussed in the Plan?	Yes - see Chapter 7.	No.
35	Meeting attendee	7/11/ Watershed 1/ Verbal	5-15	Chapter 5 - SMR Watershed - Mgmt. Issues and Conflicts	The information about the Santa Margarita River project presents information about the watershed – the funding was not for the watershed, but for the river. Please revise.	Yes, have made this revision.	Yes.
36	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	DAC Issues - General	In the rural areas there is not enough money for wastewater treatment and disposal	Yes, this is discussed in Section 3.3 of the Region Description.	No.
37	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	N/A	There is an issue with TDS in the drinking water. It seems like this should be treated further to remove TDS – with reverse osmosis systems.	Yes, there is information about water treatment in Section 3.5 of the Region Description.	No.

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38	Meeting attendee	7/11/ Watershed 1/ Verbal	N/A	DAC Issues - General	Look at the EPA Financial Hardship definition – this may give some additional information. It is from the Integrated Planning and Permit Process.	Thank you, we will look into this data source.	No.
39	Mary Clarke	7/11 Workshop, Comment Form	N/A	San Luis Rey River Watershed	Two issues relating to San Luis Rey watershed: 1) There are a lot of homeless/transient people who camp along the river, especially in the Oceanside area. I expect they are using it as a sewer. They also start fires in the brush. 2) A few years ago, there was an issue about clearing brush along the river in the Oceanside area. The problem related to the endangered avian species living in the brush. Some sort of compromise was reached, I think, but some of the endangered birds were "taken". It should be noted in your Plan that the wetlands habitat along the SLR River are inhabited by endangered avian species.	See response to comment #34 in the watershed comment matrix regarding the issue of homeless. With regards to avian species, we have added this information into the Natural Resources section of the San Luis Rey Watershed in Chapter 5.	Yes.
40	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	N/A	Is the IRWM Plan available on a website?	Yes, please visit: www.sdirwmp.org	No.
41	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	N/A	Is information included about water availability and water use?	Yes, there is information about supplies and demands in Section 3.10 of the 2013 IRWM Plan.	No.
42	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	Chapter 5	In Chapter 5 there are some references from the Port of San Diego – this is not correct, as the Port's data comes directly from the Regional Board. Please revise.	We will look at these references and try to reconcile with applicable Regional Board references.	No.
43	Meeting attendee	7/12/ Watershed 2/ Verbal	5-69	Chapter 5 - Pueblo-Climate Change Impacts	The climate change section for Pueblo mentioned sea-level rise. Is there any current evidence of this?	For now, no; however, due to the low-lying coastal areas in this watershed, this watershed is considered susceptible to sea-level rise impacts.	No.
44	Meeting attendee	7/12/ Watershed 2/ Verbal	5-69	Chapter 5 - Pueblo-Stormwater and Flood	The stormwater-flood section on the Pueblo Watershed (Page 5-69) mentions the County. This is incorrect, the County has very little jurisdiction in this watershed.	Yes, we will revise accordingly.	Yes.
45	Meeting attendee	7/12/ Watershed 2/ Verbal	5-84	Chapter 5 - Otay-Water Quality	In the Otay Watershed, Poggi Canyon is mentioned as being listed for DDT. This is not accurate, it was recently de-listed.	We will revise accordingly.	Yes
46	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	General	Does Tijuana have digital map of most contaminated areas? Would be good to know where the major cross-border issues are.	The Mexico government is working on this, and will have this information in the future.	No.
47	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	General	Can you show the entire Tijuana watershed? It isn't appropriate to cut the watershed off at the border.	Yes, we will revisethe figures in the watershed chapter (Chapter 5) to show the entire Tijuana Watershed.	Yes.
48	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	General	Can we highlight successful watershed-based projects? There are many success stories that should be told.	Yes, we will include successful project examples into the watershed chapter.	Yes.
49	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	Chapter 5 - Pueblo	There is a need to acknowledge what has been done regarding water quality, stormwater, and TMDL compliance – especially in the Chollas Creek area with Groundwork San Diego.	Yes, we will include successful project examples into the watershed chapter.	Yes.
50	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	General	Does the Plan acknowledge state-of-the-art planning tools such as the tools that SANDAG is developing for watershed planning (spatial tools)?	No, but we will work with our SANDAG contacts to gather this information.	No.
51	Meeting attendee	7/12/ Watershed 2/ Verbal	Figures	Figure 3-4A and 3-4B	Clarification about the map (dark vs. light purple) – does this show that the Sweetwater area was previously not a DAC (light purple, 2010 data) but now is (dark purple, 2013 data)?	Not necessarily – the 2013 data is on top of the 2010 data and may be over-shadowing the older data. The figures have been footnoted to clarify these distinctions.	Yes.
52	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	General - DAC	Thank you for separating urban vs. rural DACs – this is an important distinction.	N/A	No.

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53	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	General - DAC	Do you get extra points (in the IRWM project selection process) for projects within DACs?	Yes, see Chapter 9 for information about the project scoring process.	No.
54	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	General - DAC	Does the project selection process consider projects that will help water districts lower costs and potentially lower water rates? Lowering the cost of water will directly benefit urban DACs.	Refer to Chapter 9 for information about the scoring process - lowering water rates for DACs is not currently a project selection criterion.	No.
55	Meeting attendee	7/12/ Watershed 2/ Verbal	N/A	General - DAC	What about providing water via greywater systems? This would be a way to directly provide water to urban DACs.	That would be a great project! We have not received a greywater project to-date.	No.
56	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	Chapter 5 - Carlsbad	Based on the research done for the plan – can you explain how the Carlsbad Watershed is different from others in the Region?	The Carlsbad Watershed is unique for many reasons, including: it is diverse, with many jurisdictions, it is highly urbanized, it is comprised of several small catchments, it experiences substantial stormwater issues (due to urbanization), and has many institutional (jurisdictional issues). In addition, the watershed itself is comprised of several small interconnected water systems – these are somewhat like six small watersheds within the larger watershed. Some consider this watershed to be a miniature IRWM Region itself due to the diversity and watershed composition.	No.
57	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	N/A	If we had documents, how do we send them for inclusion in the IRWM Plan?	Documents that can be sent by email, please send to Rosalyn Prickett: rprickett@rmcwater.com If documents are too large to email, please either send a link (if available online), or email Rosalyn Prickett to get access to the FTP site.	No.
58	Meeting attendee	7/17/ Watershed 3/ Verbal	5-31 and 5-40	Chapter 5 - Carlsbad and San Dieguito-Natural Resources	Please add that the County MSCP effort includes some of the Carlsbad Watershed – it covers Escondido Creek and a very small portion of the San Dieguito Watershed.	Yes, we included this in the Natural Resources Section of Section 5.4 .	Yes.
59	Meeting attendee	7/17/ Watershed 3/ Verbal	5-31	Chapter 5 - Carlsbad-Natural Resources	Please add information about the Multiple Habitat Conservation Plans (MHCPs) from other municipalities. There are many in this watershed – for example, the City of Carlsbad has an approved MHCP.	Yes, we included this in the Natural Resources Section of Section 5.4 .	Yes.
60	Meeting attendee	7/17/ Watershed 3/ Verbal	5-31	Chapter 5 - Carlsbad-Natural Resources	For the Carlsbad Watershed – the Natural Resources section has an error. This section mentions ongoing efforts to eradicate clerpa from Agua Hedionda. This effort is not ongoing – it was successful and has been completed.	Yes, we included this in the Natural Resources Section of Section 5.4 .	Yes.
61	Meeting attendee	7/17/ Watershed 3/ Verbal	5-31	Chapter 5 - Carlsbad-Stormwater and Flood	For the Carlsbad Watershed – the Stormwater/Flood section has an error. Lake San Marcos is mentioned as a flood control facility. This lake is only for agricultural irrigation, and is not part of the flood control system.	Yes, we included this edit in the Stormwater and Flood Management Section of Section 5.4 .	Yes.
62	Meeting attendee	7/17/ Watershed 3/ Verbal	5-30	Chapter 5 - Carlsbad-Water Quality	For the Carlsbad Watershed – the Water Quality section needs to be updated. Some of the 303(d) listings are not accurate – specifically, the Pacific Shoreline is no longer listed at Buena Vista Creek.	Yes, we included this edit in the Water Quality Section of Section 5.4 .	Yes.
63	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	N/A	Adding the watershed-specific information into a large-scale planning document such as the IRWM Plan is important and encouraging. Will this watershed emphasis be carried through to the project selection process?	Yes, see Chapter 9 for information about the project scoring process.	No.
64	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	Chapter 5 - Carlsbad	This watershed is particularly unique. With the implementation of the Emergency Storage Project, this watershed is linked to the regional imported water system (Lake Hodges). It seems that the issues presented for this watershed will be further-elevated in the next project selection process, because the watershed now has such a regional connection.	Yes, see Chapter 9 for information about the project scoring process.	No.
65	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	N/A	The regional/watershed-based approach seems particularly important for groundwater management (salt and nutrient management planning).	Yes, the SNMP requirements and relevant SNMPs in the San Diego IRWM Region are described in Chapter 7.	No.

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66	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	Chapter 11 - Implementation	You mentioned that the 2013 IRWM Plan includes a section on diversification of funding. What information is included?	This section, located in Chapter 11, Implementation, includes information about funding for the IRWM Program and IRWM projects. For the IRWM Program, it is acknowledged that to-date, funding has come from statewide sources (water bonds). This section mentions that future water bond funding, and therefore future IRWM Program funding is uncertain. This section also provides information about a variety of other grant and loan programs that project sponsors could look to for other funding options.	No.
67	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	General - DAC	Cannot believe that there are mapped DACs in Sorrento Valley! This seems false.	Yes, we agree. See response to #37 in the watershed comment matrix.	Yes.
68	Meeting attendee	7/17/ Watershed 3/ Verbal	N/A	General - DAC	Do projects get prioritized if they are within a mapped DAC?	Yes, see Chapter 9 for information about the project scoring process.	No.
69	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	N/A	Is the IRWM Plan available on a website?	Yes: www.sdirwmp.org	No.
70	Meeting attendee	7/19/ Watershed 4/ Verbal	?	Highlights	The map that you showed has the Inaja and Cosmit tribal reservations outside of the IRWM Region – these tribal lands are within the coastal-draining watershed.	Thank you, we will amend this graphic. This is the tribal graphics in the Highlights document and Figure 6-2 in Chapter 6.	Yes.
71	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	N/A	How much funding is left for the San Diego Region in Round 3 of Proposition 84?	Approximately \$45 million.	No.
72	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	N/A	Would like to commend the efforts that have been taken to-date to encourage the watershed-based approach that is being taken with the 2013 IRWM Plan. Hopefully this focus will continue forward when selecting projects for future rounds of funding.	N/A	No.
73	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	N/A	Why is there no environmental rubric that is used to determine environmental impacts under CEQA? Is this something that can be developed?	The determination of impacts under CEQA is complicated and project-specific. This is a state law that would be very difficult to amend to have a strict rubric.	No.
74	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	Chapter 9	How are projects prioritized for IRWM Funding?	Refer to Chapter 9 of the 2013 IRWM Plan, which has this information in lengthy details. There are several steps: the first includes a general screening (does the project meet Objective A, B, and at least one other objective?) Next, there is a scoring process that takes place based on project merit. This information is given to a selection workgroup, which evaluates the projects, conducts interviews, and makes a final decision.	No.
75	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	N/A	Thank you for including information about Famosa Slough; this is a very important resource to the Region.	N/A	No.
76	Meeting attendee	7/19/ Watershed 4/ Verbal	N/A	Chapter 5 - Peñasquitos	It seems as though Tecolote Creek was not mentioned as a water body that drains to Mission Bay.	This information is in the IRWM Plan, just was not included in the presentation.	No.
77	Shasta Gaughen, Pala Tribe	7/30/13	4-7	Final Paragraph, Second Sentence	This sentence references the Winters Doctrine and proposes that tribes are now relying on previously unused water rights. Tribes have been using their water rights for decades, and not just recently in response to new economic developments. It may be more accurate to rephrase this sentence to read "unclaimed" or "undocumented by the County Water Authority" rather than "unused."	Yes, we modified the sentence accordingly: "To support economic development on the reservations, tribes are relying on their previously unused <u>unclaimed</u> water rights under the Winters Doctrine to extract water from the underlying groundwater basins."	Yes
78	Shasta Gaughen, Pala Tribe	7/30/13	4-8	List of water protection measures	<p>The list of water protections measures should include the following:</p> <p>Maximizing water conservation by:</p> <p>Using native, drought-resistant plants in landscaping</p> <p>Using proper irrigation timing and duration</p> <p>Implementing indoor water conservation practices in kitchens</p> <p>Managing water quality by:</p>	We modified the list of water protections measures as suggested.	Yes

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79	Shasta Gaughen, Pala Tribe	7/30/13	4-21	Section 4.7.3, Water Management Issues, Number 15	Tribal environmental departments' water quality programs For the issue regarding coordination of MSCP (15) - tribal lands often get allocated as assumed wildlife corridors and/or natural spaces that will not be developed in the County's MSCP without any consultation with the tribe or acknowledgement of tribal development plans. It might be useful to add this issue to this summary item	Yes, have made this revision	Yes
80	Shasta Gaughen, Pala Tribe	7/30/13	N/A	Chapter 4 and Chapter 5	See several stylistic edits.	Yes, have made this revision	Yes
81	Marisa Soriano, City of Chula Vista	7/31/13	3-55	Table 3-24	Remove DDT from Otay	Yes, have made this revision	Yes
82	Marisa Soriano, City of Chula Vista	7/31/13	3-60	Table 3-28	Footnote 2 states that Pueblo and Sweetwater are assessed as a single watershed unit. Suggest deleting this footnote and replace it with a note that states: Pueblo, Sweetwater, and Otay are monitored and assessed separately, but are all a part of the San Diego Bay WMA. Also, Footnote 2 should be deleted from the San Juan Watershed.	Yes, have made this revision	Yes
83	Marisa Soriano, City of Chula Vista	7/31/13	Page 5-76	5.9, Sweetwater Watershed	Sweetwater Watershed - The water quality section should also briefly highlight the various storm water quality monitoring programs in the watershed, rather than just waterbody impairment in the first paragraphs.	We have updated the water quality section with information about the WURMP and water quality programs.	Yes
84	Marisa Soriano, City of Chula Vista	7/31/13	Page 5-77	5.9, Sweetwater Watershed	Sweetwater Watershed - first full paragraph on the page states the "County is responsible for...maintaining storm drains, channels, and debris basins." Although the County is responsible for removing trash and debris from the engineered section of the Sweetwater River, there are more agencies than the County who are responsible for storm drain maintenance in the watershed. Recommend changing this paragraph to reflect that each Copermittee or agency in the Sweetwater watershed is responsible for maintenance of their storm drain structures. In addition, it is important to note that there is a new storm water permit that requires the development of a Water Quality Improvement Plan for the entire San Diego Bay Watershed, which includes the Sweetwater HA.	Yes, have made this revision	Yes
85	Marisa Soriano, City of Chula Vista	7/31/13	Page 5-84	5.10, Otay Watershed	Otay Watershed - Remove DDT from Poggi Canyon Creek	Yes, have made this revision	Yes
86	Marisa Soriano, City of Chula Vista	7/31/13	Page 5-84	5.10, Otay Watershed	Otay Watershed - The water quality section should also briefly highlight the various storm water quality monitoring programs in the watershed, rather than just waterbody impairment in the first paragraphs.	Yes, have made this revision	Yes
87	Marisa Soriano, City of Chula Vista	7/31/13	Page 5-85	5.10, Otay Watershed	Otay Watershed - The second paragraph on the page states the "County is responsible for...maintaining storm drains, channels, and debris basins." There are more agencies than the County who are responsible for storm drain maintenance. Recommend changing this paragraph to reflect that each Copermittee or agency in the Otay watershed is responsible for maintenance of their storm drain structures. In addition, it is important to note that there is a new storm water permit that requires the development of a Water Quality Improvement Plan for the entire San Diego Bay Watershed, which includes the Otay HA.	Yes, we have added other responsible parties in this section.	Yes

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88	Marisa Soriano, City of Chula Vista	7/31/13	Page 5-85	5.10, Otay Watershed	Otay Watershed - The last paragraph of the Storm Water and Flood Management Section talks about erosion and modification of the hydrologic regime due to increased development. It is important to note that although development may occur, post-construction BMPs and requirements of the region's hydromodification plan will help to mitigate these effects.	Yes, we have mentioned BMPs and other mitigation activities in this section.	Yes
89	Marisa Soriano, City of Chula Vista	7/31/13	Page 8-14	Section 8.4.16	It is not clear why 303(d) listings and TMDLs are discussed in the pollution prevention section. Suggest deleting first two sentences. Also, there are other agencies or organizations that implement pollution prevention programs other than the storm water Copermittees.	We have modified this section accordingly.	Yes
90	Marisa Soriano, City of Chula Vista	7/31/13	Appendix C	Table C-1	Remove DDT from Poggi Canyon	Yes, have made this revision	Yes
91	Jill Witowski, Coastkeeper and Julie Chunn-Heer, Surfrider	7/31/13	8-11	Recycled Municipal Wastewater Text Box	The description of the City of San Diego's WPDP on page 8-11 should be updated to reflect the latest results. The 2009 summary currently included in the draft fails to recognized the project's overwhelming success and the implications for potable reuse in the region.	Yes, have made this revision	Yes
92	Doug Gibson, San Elijo Lagoon Conservancy	7/31/13	5-29	5.4 Carlsbad Watershed	Under the Carlsbad Hydrological Unit only two of the lagoon systems are outlined in the text. I believe that all lagoons within the boundary should be outlined under the natural resources section. Just listing Buena Vista and Agua Hedionda is very limiting when the majority of the diversity and rare/endangered species exist in Batiquitos and San Elijo Lagoon. My suggestion would be to add a paragraph for each lagoon or eliminate singling them out and make the discussion general about the general aspects of them all. I would favor having them listed with their own as it does add weight, especially once the 303d impairments are lined up with them	Yes, have made this revision	Yes
93	Doug Gibson, San Elijo Lagoon Conservancy	7/31/13	5-32 and 5-33	5.4 Carlsbad Watershed, Issues and Conflicts	It again is jaded towards Buena Vista and Agua Hedionda. Issues should be outlined for all watersheds and receiving bodies, not just the two northern systems.	Yes, have made this revision	Yes
94	Ruth Kolb and Mark Stephens, City Stormwater Department	7/30/13	3-14 and 3-15	Figure 3-4B and Table 3-9	Listings of Disadvantaged Communities in Figure 3-4B, "Location of Disadvantaged Communities in Central Area," in comparison to Table 3-9, "Economically Disadvantaged Communities," appear to have inconsistencies regarding which communities meet 2010 and 2013 criteria. The Figure 3-4B listings and IRWM Plan text description on page 3-16 show Miramar Air Station CPA as the only City Community Planning Area (CPA) meeting 2010 Disadvantaged Community (DAC) criteria, but not 2013 DAC criteria. However, Table 3-9 shows several Community Planning Areas as "2010 DACs," but not "2013 DACs," including Mission Bay Park, Normal Heights, Old San Diego, Barrio Logan, City Heights, Encanto, Southeastern San Diego, and San Ysidro.	Yes, will cross-check and make these edits.	Yes
95	Ruth Kolb and Mark Stephens, City Stormwater Department	7/30/13	3-61	Table 3-28, Summary of Water Quality Issues for Surface Waters	Replace "Coliform Bacteria" with "Fecal Indicator Bacteria" in the heading.	Yes, have made this revision	Yes

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96	Ruth Kolb and Mark Stephens, City Stormwater Department	7/30/13	3-70	3.9 Flood Management	Add this text to 3rd paragraph: "An additional flood risk that can be exacerbated by wildfires is non-native invasive vegetation species. Land that has been cleared by wildfire is more susceptible to regrowth of non-native invasive vegetation species. Invasive species, such as giant reed (<i>Arundo donax</i>), can outcompete native species and dominate riparian areas. Once established, <i>Arundo</i> in particular can change diverse native riparian areas into monotypic non-native riparian areas. <i>Arundo</i> provides very little habitat value to native wildlife and dead and dry stands can become a fire hazard themselves. The root system of <i>Arundo</i> along with its typical dense growth structure can cause increased sedimentation and narrow channels. This increases flood risk through higher velocity flow, which can cause scouring and erosion downstream."	We have incorporated these edits with some language changes	Yes
97	Ruth Kolb and Mark Stephens, City Stormwater Department	7/30/13	3-80	Table 3-35	The San Diego National Wildlife Refuge is in multiple watersheds (not just San Diego Watershed). Per the U.S.Fish & Wildlife Service at http://www.fws.gov/refuge/San_Diego_Bay/map.html the San Diego Bay National Wildlife Refuge is in at least the Sweetwater and Otay Watersheds (Sweetwater Marsh and South San Diego Bay Units) .	Yes, have made this revision	Yes
98	Marsha Cook, County of San Diego Watershed Protection Program	7/31/13	5-69	5.8 Pueblo Watershed	Stormwater management section jurisdictions include: City of San Diego, County of San Diego, National City, La Mesa, Lemon Grove, the Port of San Diego, and the Airport Authority	Yes, have made this revision	Yes
99	Kristen Crane, City of Poway	7/31/13	7-6	Table 7-3: Summary of San Diego Region Water Supply Plans	Footnote 5 does not seem applicable to the agencies listed in the table identified with a footnote 5.	Yes, have made this revision	Yes
100	Kristen Crane, City of Poway	7/31/13	7-6	Table 7-3: Summary of San Diego Region Water Supply Plans	The City of Poway is not listed as having a Recycled Water Master Plan or Sanitary Survey, but we do. Copies are available upon request.	Yes, have made this revision	Yes
101	Kristen Crane, City of Poway	7/31/13	8-15	Section 8.4.20: Economic Incentives	Many of the water agencies in the County offer economic incentive programs to encourage water conservation, not just the Water Authority and the City of San Diego.	Yes, have made this revision	Yes
102	Kristen Crane, City of Poway	7/31/13	10-7	Table 10-2: List of Potential Data Sources for IRWM Planning	Should Point Loma outfall ocean monitoring data be incorporated?	This data is incorporated under "Water quality monitoring to verify compliance with permit conditions." We have added information that clarifies outfall data is included.	Yes
103	Kristen Crane, City of Poway	7/31/13	N/A	Table 10-6: Technical Analysis and Methods Used in the 2013 IRWM Plan	What about inclusion of documentation pertaining to the Federal EPA permits/waiver for ocean discharge for effluent from the Point Loma Wastewater Treatment Plant?	We did not specifically use this technical data to develop the IRWM Plan, so this source is not included.	No.

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104	Kristen Crane, City of Poway	7/31/13	1-14	Appendix 7-C – San Diego IRWM Land Use Planning Study – Page 1-14	Is the “Model Water Resources General Plan: Policy Guide” final?	Yes, this document is considered final.	No.
105	Rob Hutsel, San Diego River Park Foundation	7/31/13	5-53	5.7 San Diego River Watershed	Modify population to 509,000 (page 5-59)	Yes, have made this revision	Yes
106	Rob Hutsel, San Diego River Park Foundation	7/31/13	5-53	5.7 San Diego River Watershed	Lakeside is an unincorporated community of SD County	Yes, have made this revision	Yes
107	Rob Hutsel, San Diego River Park Foundation	7/31/13	5-53	5.7 San Diego River Watershed	El Capitan Reservoir is also an important reservoir because it provides so much locally sourced water. This should also be reflected in these comments. It also has a tremendous impact on the health of the River system as it creates effectively a 100% break in the river.	Yes, have made this revision	Yes
108	Rob Hutsel, San Diego River Park Foundation	7/31/13	5-53	5.7 San Diego River Watershed	FSDRIP does provide some flood protection, but it covers only a short section of the river and Mission Valley is impacted tremendously by flooding. This sentence should be modified to reflect this ongoing flooding issue in Mission Valley and Grantville.	Yes, have made this revision	Yes
109	Rob Hutsel, San Diego River Park Foundation	7/31/13	5-55	5.7 San Diego River Watershed	San Diego River does not flow through Famosa Slough. Famosa Slough is a tidally influenced area.	Yes, have made this revision	Yes
110	Rob Hutsel, San Diego River Park Foundation	7/31/13	5-55	5.7 San Diego River Watershed	See comment #107 on the El Capitan Reservoir	Yes, have made this revision	Yes
111	Rob Hutsel, San Diego River Park Foundation	7/31/13	5-56	5.7 San Diego River Watershed	We question the statement of “due to the insufficient clean-up efforts.” This language should be modified so that it is fact rather than an opinion.	Yes, have made this revision	Yes
112	Rob Hutsel, San Diego River Park Foundation	7/31/13	5-58	5.7 San Diego River Watershed	The language about the Mission Bay landfill is incorrect. There is no correlation to the Lakeside Water District.	Yes, have made this revision	Yes
113	Rob Hutsel, San Diego River Park Foundation	7/31/13	5-58	5.7 San Diego River Watershed	The San Diego River Park Foundation considers the water quality poor in the lower San Diego River.	Yes, have made this revision	Yes
114	Rob Hutsel, San Diego River Park Foundation	7/31/13	5-58	5.7 San Diego River Watershed	Forrester Creek is misspelled (twice)	Yes, have made this revision	Yes
115	Rob Hutsel, San Diego River Park Foundation	7/31/13	5-59	5.7 San Diego River Watershed	FSDRIP provides flood protection for some of Mission Valley. Please modify current language. Flooding is a significant issue in Mission Valley.	Yes, have made this revision	Yes
116	Rob Hutsel, San Diego River Park Foundation	7/31/13	5-59	5.7 San Diego River Watershed	Eastern Portion: please include language about the presence of wild rainbow trout as an important species.	Yes, have made this revision	Yes

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117	Rob Hutsel, San Diego River Park Foundation	7/31/13	5-59	5.7 San Diego River Watershed	Please include language about the significance of the 300+ acre San Diego River estuary.	Yes, have made this revision	Yes
118	Rob Hutsel, San Diego River Park Foundation	7/31/13	N/A	5.7 San Diego River Watershed	one of the key characteristics of the San Diego River Watershed is the Army Corps of Engineers Flood Control Project covering approximately 3 miles of the lower portion of the River. This project altered flows of the river, preventing it from flowing to San Diego Bay and the area currently known as Mission Bay, except during high flood waters. As recently as 1941 waters of the San Diego River flowed to San Diego Bay.	Yes, have made this revision	Yes
119	Rob Hutsel, San Diego River Park Foundation	7/31/13	N/A	5.7 San Diego River Watershed	reference should be provided to efforts under way to create the San Diego River Park system. The City of San Diego recently adopted a river park master plan to cover 17.5 miles of the river in the City of San Diego. This is an important step in creating a better future for the San Diego River.	Yes, have made this revision	Yes
120	Amanda Mathews, Ramona Resident	7/31/13	N/A	Watersheds: San Diego River and San Dieguito	Speaking as a citizen from one of your designated DACs, the town of Ramona, I would like to bring to your attention the problem of invasive species becoming increasingly established in our water ways. As you likely aware, the town of Ramona sits in the middle of two important watersheds for the region, namely the San Diego River and the San Dieguito River. Both waterways are impacted by our region's invasive species problem.	Yes, have made this revision	Yes
121	Amanda Mathews, Ramona Resident	7/31/13	N/A	Watersheds: San Diego River and San Dieguito	The Santa Maria Creek flows through the town of Ramona and is heavily impacted with invasive species. I have been told that Santa Maria Creek is not considered part of either watershed and yet it drains to the San Pasqual valley and the invasive species problem not only serves as a seed and propagule source for invasions down stream but also has an impact on the health of the creek in town which is the home of a number of endangered species. Furthermore, the impact of the Santa Maria Creek by species such as Arundo serves as a source of flooding concerns. If there were to be a significant flood event, which has happened in semi-recent years this species could be the coup de grace to an already catastrophic event. The presence of Arundo also in the waterways draining to San Vicente Reservoir not only limit the ability for surface water accumulation in the reservoir but also could contribute to an equally problematic flood event should there be flooding that were to occur in the creeks running adjacent to Mussey Grade making the road impassible for residents living down Mussey Grade Rd. for which there is only one entrance and exit point for that part of the community due to the very presence of the San Vicente Reservoir.	Yes, have made this revision	Yes
122	Amanda Mathews, Ramona Resident	7/31/13	N/A	Watersheds: San Diego River and San Dieguito	The invasive species problems in both of these areas also contributes to a fuel source contributing to wildfire concerns. in response to wild fires these species are known to regenerate faster than "creek friendly natives." Should there be a fire before eradication efforts take place the problem will likely worsen in the waterways.	Have acknowledged wildfire issues associated with invasive species Chapter 3.	Yes

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123	Amanda Mathews, Ramona Resident	7/31/13	N/A	Watersheds: San Diego River and San Dieguito	The Ramona region is also a mixture of households with dependence on ground water and or RMWD water and some are on sewer and some with septic adding to a complexity when determining whether we are afflicted by "urban" vs. "rural" DAC considerations.	Yes, have made this revision	Yes
124	Amanda Mathews, Ramona Resident	7/31/13	N/A	Watersheds: San Diego River and San Dieguito	Finally because a number of the areas mentioned are in fact privately owned efforts to incorporate and educate property owners about invasive species and their problems is of paramount importance to any thorough eradication efforts and management.	Yes, have made this revision	Yes
125	Jill Terp, USFWS	7/31/13	5-77	Section 5.9 Sweetwater	Add this text into the Natural Resources section (bold): The Sweetwater River estuary, located on the border of National City and the City of Chula Vista, is a broad, straight, deep channel that forms that mouth of the Sweetwater River. The mouth of the Sweetwater River is the Estuary's primary source of fresh water subject to tidal influences. The outer portion of the Estuary is surrounded by commercial and industrial lands uses to the north, whereas the southern side is bordered by the Sweetwater Marsh Unit of the San Diego Bay National Wildlife Refuge (SDBW (b). N.D.e). The Sweetwater Marsh Unit (deleted National Wildlife Refuge) is 316 acres of diverse marshland that supports populations of light-footed clapper rail, California least terns, Belding's savannah sparrows, salt marsh bird's beak, and Palmer's frankenia (USFWS (a), 2011). The Sweetwater Marsh Unit is part of the San Diego National Wildlife Refuge Complex, a series of national wildlife refuges that were established to preserve and protect coastal habitat marshes (USFWS (b), 2012), as is the San Diego National Wildlife Refuge which lies inland along the Middle Sweetwater HA. This inland Refuge protects riparian habitat for the endangered least Bell's vireo, southwestern willow flycatcher, and arroyo toad along the Sweetwater River (USFWS 1997). Adjacent uplands support coastal sage scrub, chaparral, vernal pools, and oak woodlands that support rare species such as California gnatcatcher, quino checkerspot butterfly, San Diego fairy shrimp, San Diego ambrosia, and San Diego thorn-mint.	Yes, have made this revision	Yes
126	Kurt Zimmerman, California Trout	7/31/13	N/A	N/A	There is no mention in the Plan of the historic or current presence of the endangered Southern CA steelhead in most of the Region's watersheds. The Plan's Appendix 3D purports to identify the "endangered and threatened species in the San Diego IRWM area". It accurately reports that the northern boundary of the steelhead's range is the Santa Maria River in Santa Barbara County. It erroneously states, however, that the southern boundary of that species' range is the San Mateo Creek. The southern boundary of the species' range is actually the US-Mexico border.	The historic range of steelhead has been added into the Region Description (Section 3.8).	Yes

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127	Kurt Zimmerman, California Trout	7/31/13	N/A	N/A	The National Marine Fisheries Service (NMFS) estimates that annual, historic runs of Southern California steelhead have declined from 32,000 to 46,000 adults to currently less than 500 today. NMFS Southern California Steel head Recovery Plan (NMFS Recovery Plan) at xiii. (January 2012). In 1997, an Environmentally Significant Unit (ESU) of the Southern California steelhead was listed as an endangered species under the federal Endangered Species Act - i.e., "a species that is in danger of extinction throughout all or a significant portion of its range." Under this "first" listing, the original ESU boundaries ran from the Santa Maria River in the north to Malibu Creek in the south. In 2002, however, the range of the ESU was extended south to the US-Mexico border. NMFS Recovery Plan at 1-4. In 2006, the ESU nomenclature was changed to Distinct Population Segment (DPS). Following a subsequent status review of West Coast steelhead populations in 2005, NMFS made a final listing determination for the Southern California steelhead DPS. NMFS Recovery Plan at 1-4. The current "designation for the Southern California steelhead DPS encompasses all naturally spawned steelhead between the Santa Maria River (inclusive) and the U.S.-Mexico border." NMFS Recovery Plan at 1-4.	Thank you for the information. The NMFS Southern California Steelhead Recovery Plan is mentioned in the document and incorporated by reference. Please refer to the Natural Resources Section of Section 5.2, Santa Margarita Watershed.	No
128	Kurt Zimmerman, California Trout	7/31/13	N/A	N/A	Accordingly, CalTrout and Trout Unlimited request that the RWMG and its consultants revise the Plan's Appendix 3D to reflect the Southern California steelhead's actual range is the Santa Maria River in the north and extends through San Diego County and the San Diego IRWM area to the U.S.-Mexico border. Further, because the species' range includes the San Diego IRWM area, CalTrout and Trout Unlimited request that the RWMG and its consultants implement the final Plan in a manner that protects and restores this endangered fish and its habitat.	We have not revised the appendix, but have noted in the document (Chapter 3, Section 3.8) that the actual range of the trout is the U.S. - Mexico border. We have also incorporated the NMFS Recovery Plan by referenced, and used this document as a source document (refer to Section 5.2 in Chapter 5).	Yes

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129	Kurt Zimmerman, California Trout	7/31/13	N/A	N/A	Another omission in the Plan is any reference to the afore-mentioned NMFS Recovery Plan. The federal Endangered Species Act mandates that NMFS develop and implement recovery plans for the conservation of listed species. In January 2012, NMFS issued its NMFS Recovery Plan for the endangered Southern California steelhead. NMFS considers the implementation of the NMFS Recovery Plan to be absolutely vital to the continued persistence and recovery of the species. Indeed, the Recovery Plan identifies the Southern California steelhead population inhabiting the Santa Margarita River and the San Luis Rey River, which are watersheds located in the San Diego IR WM area, as "Core 1." A Core \ population has "the highest priority for recovery actions based on a variety of factors" (NMFS Recovery Plan, 7-3 to 7-6, 13-20). In addition, the Recovery Plan has proposed recovery actions in those watersheds as "Critical Recovery Actions." NMFS Recovery Plan at p. 13-20. A Critical Recovery Action has the highest priority across the DPS and within core watersheds to achieve recovery objectives and criteria." NMFS Recovery Plan at 7-6. The NMFS Recovery Plan also contains a list of proposed steelhead recovery actions in other watersheds in the San Diego IR WM area including the San Diego River, the San Dieguito River, the Sweetwater River, the Otay River and the Tijuana River. NMFS Recovery Plan at 31 -21 to 13-79.	The NMFS Recovery Plan is discussed in Chapter 5, when discussing the Santa Margarita River Watershed. The reference in that section "NMFS 2012" is specifically referring to the NMFS Recovery Plan.	No
130	Kurt Zimmerman, California Trout	7/31/13	N/A	N/A	Accordingly, CalTrout and Trout Unlimited request that the RWMG and its consultants reference the NMFS Recovery Plan in the [mal Plan. Further, CalTrout and Trout Unlimited request that the R WMG and its consultants implement the final Plan in a manner that is consistent with the NMFS Recovery Plan and with special attention to NMFS' proposed recovery actions in the San Diego IRWM area.	See response to comment #129 above.	No
131	Garth Koller, City of San Marcos	7/31/13	N/A	N/A	<div>The City of San Marcos officially requests that these projects and other comments be formally included in the Final 2013 IRWM plan</div> <div>Ongoing efforts in the Upper San Marcos Watershed (Upper San Marcos Creek/Lake San Marcos Nutrient Voluntary Stakeholder TMDL and USMC Nutrient Management Plan</div> <div>San Marcos Creek District Specific Plan/SR 78 Corridor and 401 Permit/Master WQTR</div> <div>Adopted 2012 General Plan Update/Final EIR</div> <div>Draft Climate Action Plan</div> <div>City of San Marcos DAC GIS data file and map</div>	Yes, we have included information about these efforts	Yes
137	Garth Koller, City of San Marcos	7/31/13	3-14	Figure 3-4A and 3-4B	Add San Marcos DAC-Census Tracts	Yes, have made this revision	Yes
138	Garth Koller, City of San Marcos	7/31/13	3-15	Table 3-9: Economically Disadvantaged Communities	Add City of San Marcos to the Carlsbad Watershed	Yes, have made this revision	Yes
139	Garth Koller, City of San Marcos	7/31/13	3-16	Bullet list of Urban DACs Issues and Needs	Add City of San Marcos DAC area	Yes, have made this revision	Yes

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140	Garth Koller, City of San Marcos	7/31/13	3-24	Table 3-11: Member Agency Water Supply-Water Authority Service Area	Add desalination column into this table	Have not included seawater desalination because it has not yet been implemented in the Region.	No
141	Garth Koller, City of San Marcos	7/31/13	3-51	Section 6.4 Stormwater Agencies	Correct date on this page: Watershed Technical Advisory Committee was formed on June 27, 2013	We received a different date from the County of San Diego (2004), and have incorporated this date.	Yes
142	Garth Koller, City of San Marcos	7/31/13	3-57	Table 3-26: Summary of TMDLs in Progress	Add the Upper San Marcos Creek/Lake San Marcos Voluntary Agreement for Nutrients with the Regional Board under the Carlsbad Watershed.	Yes, have made this revision	Yes
143	Garth Koller, City of San Marcos	7/31/13	3-58	Table 3-27: High Priority Dry and Wet Weather Constituents	San Marcos Creek in Carlsbad is missing. TWAs in San Marcos Creek should be added	Yes, have made this revision	Yes
144	Garth Koller, City of San Marcos	7/31/13	3-59	Nutrient sub-bullet	Should identify inland creek and lake systems to the areas in which nutrients are of particular concern.	Yes, have made this revision	Yes
145	Garth Koller, City of San Marcos	7/31/13	3-60	Table 3-28: Summary of Water Quality Issues for Surface Waters	Given the SWRCB Trash TMDL, shouldn't the "trash and debris" column be checked for all watersheds and footnoted?	No - we have left as is for consistency with the cited sources	No
146	Garth Koller, City of San Marcos	7/31/13	3-66	Table 3-31: Summary of Water Quality Issues for Principal Groundwater Aquifers	Table is missing San Marcos HA under the San Luis Rey River.	No - we do not have the groundwater aquifer information to update the table	No
147	Garth Koller, City of San Marcos	7/31/13	3-70	Section 3.9 Flood Management, Table 3-33: Local Hog Spot Flood Areas	Please add to the table: San Marcos Creek from Discovery Street to East of SR 78 (Johnson Lane and Las Posas/Unnamed Tributaries to Rancho Santa Fe Road. Please add Twin Oaks Creek-Sycamore/Walnut Grove in the Carlsbad Watershed.	Yes, have made this revision	Yes
148	Garth Koller, City of San Marcos	7/31/13	7-2	Table 7-1: IRWM Relation to Local Water Management Planning	Separate Basin Plan Triennial Review - should be an IRWM action	This is an IRWM action (not appropriate to include in the table in Chapter 7) - we will cross-reference Chapter 11 on implementation	No
149	Stephanie Bauer, Port of San Diego	7/31/13	N/A	Chapter 5, Watersheds	Sub-sections (i.e., water quality) should be in same order for every watershed. Need to update so that all watersheds' subsections are discussed in same order.	Yes, have made this revision	Yes
150	Stephanie Bauer, Port of San Diego	7/31/13	N/A	Section 5.8, 5.9, and 5.10 Water Quality Sections	Should discuss watershed-specific (Pueblo, Sweetwater, and Otay) water quality in this section first then can provide standard San Diego Bay water quality information in all three sections.	Have added information about watershed-specific water quality for each.	Yes

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151	Stephanie Bauer, Port of San Diego	7/31/13	N/A	Section 5.8, 5.9, and 5.10 References Sections	Remove the first two Port references ("Total Maximum Daily Loads" and Stormwater Management") as these pages are no longer on the Port's website. Recommend to use the a more regional website like the Project Clean Water website or Regional Board website as a source, or regulatory document.	We have left as is for consistency with previously cited sources	No.
152	Stephanie Bauer, Port of San Diego	7/31/13	5-65	Section 5.8; second paragraph, second sentence	The Chollas Creek sentence does not fit in this paragraph which seems to be focused on development. Suggest moving to third paragraph.	Yes, have made this revision	Yes
153	Stephanie Bauer, Port of San Diego	7/31/13	5-65	Section 5.8, second paragraph, third sentence	Since the primary land use is residential, suggest revising this sentence.	Yes, have made this revision	Yes
154	Stephanie Bauer, Port of San Diego	7/31/13	5-65	Section 5.8, third paragraph, first sentence	Delete first sentence. The sentence seems out of place, with no additional information is provided, and is taken out of context.	Yes, have made this revision	Yes
155	Stephanie Bauer, Port of San Diego	7/31/13	5-66	Figure 5.8	Include jurisdictional boundaries and US Navy property on map. If the resolution is too wide to include this, perhaps add the sub watershed outlines?	We do not have these layers, we have not included the Navy on the map nor the sub watershed outlines for consistency with the rest of the maps.	No.
156	Stephanie Bauer, Port of San Diego	7/31/13	5-67	Section 5.8, Hydrology Section	Change sentence to read "The major waterways in this watershed that drains into San Diego Bay are Chollas Creek; other waterways of importance include Paleta and Switzer Creeks and Paleta Creeks".	Yes, have made this revision	Yes
157	Stephanie Bauer, Port of San Diego	7/31/13	5-67	Section 5.8, "Water Systems" section, paragraph 2	Paragraph two only mentions the Sweetwater Groundwater Basin, but the Mission Valley GW Basin is also part of the Pueblo Watershed.	Yes, have made this revision	Yes
158	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, "Internal Boundaries and Land Uses" section, second paragraph	Delete first sentence and change the rest of the paragraph to read "The Pueblo watershed is within the jurisdictions of the Cities of San Diego, La Mesa, Lemon Grove, National City, the Port of San Diego, the Regional Airport Authority and a small portion of the County of San Diego(0.3%)."	Yes, have made this revision	Yes
159	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, Water Quality Section	This section needs work. Some suggestions follow but it may need additional editing. Doesn't really say anything about the current status of the overall health or quality of the Pueblo watershed in particular.	Have added info about Chollas Creek into this section	Yes
160	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, Water Quality Section, second paragraph	The pollutants/stressors of concern discussed here should include those identified in the 2008 WURMP plan, not just 303d listings.	We have just included the 303d listings for consistency with the other sections	No
161	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, Water Quality Section, second paragraph	Delete first and third sentence, and change second sentence to read: "The Pueblo Watershed is highly impacted by pollutants carried by urban runoff from residential areas, streets and roadways, commercial and industrial areas, and construction. Surface water degradation, sediment toxicity, and habitat degradation can occur due to existing pollutants including metals, bacteria, oil and grease, pesticides, sediment, and trash."	We have incorporated these edits with some language changes	Yes

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162	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, Water Quality Section, first paragraph	Move first paragraph to end of second paragraph, so now the first paragraph in section reads: "The Pueblo Watershed is highly impacted by pollutants carried by urban runoff from residential areas, streets and roadways, commercial and industrial areas, and construction. Such pollutants include metals, bacteria, oil and grease, pesticides, sediment, and trash. The SWRCB 303(d) list includes the three creeks and a section of San Diego Bay shoreline within the Pueblo watershed (Ref). Chollas Creek is listed for copper, lead, zinc, bacteria, diazinon, trash, phosphorous, and nitrogen. Switzer Creek is listed for copper, lead, zinc, while Paleta Creek is listed for copper and lead. The section of San Diego Bay shoreline noted above is listed for PAHs, PCBs, and chlordane."	We have incorporated these edits with some language changes	Yes
163	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, Water Quality Section, third paragraph	Move to end of the "Water Quality" section before TMDL language	We have modified the section - this edit no longer applies.	No
164	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, Water Quality Section, third paragraph	Delete first sentence. Change the next two sentences to read "Additionally, there are 303(d) listings for areas of San Diego Bay for copper, benthic community effects, sediment toxicity, bacteria, chlordane, and PAHs. The sources of pollutants are primarily from stormwater discharges, shipyard operations, and dry weather nuisance flows."	Yes, have made this revision	Yes
165	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, Water Quality Section, third paragraph	Delete last four sentences, starting with "Any disturbances of the bay bottom sediment can release pollutants to overlying water where water column organisms can be exposed (ref)" Either the information seems to be not necessary for this document or is simply incorrect. TMDL projects have NOT been put in place in all areas. In addition, TMDLs are not put in place to assess but implement and are done to result in a pollutant load reduction.	Yes, have made this revision	Yes
166	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, Water Quality Section, sixth paragraph	Keep TMDL discussion to very end of the "Water Quality" section	Yes, have made this revision	Yes
167	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, Water Quality Section, sixth paragraph, last sentence	Delete last sentence "The San Diego Water Board is considering adopting other TMDLs in the pueblo watershed, including San Diego Bay Marine Sediment TMDL ...".	Yes, have made this revision	Yes
168	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, Stormwater and Flood Management Section, first and second paragraph	Need to move first and second paragraph to end of section. Talk about stormwater first then Flood management (per the heading of the sub-section).	No - we have left as is for consistency between sections.	No.
169	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, Stormwater and Flood Management Section, first paragraph	Change "Las Chollas Creek" to "Chollas Creek", Change "Las Puleta Creek" to "Paleta Creek", and change "South Las Chollas Creek" to "South Chollas Creek"	Yes, have made this revision	Yes

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170	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, Stormwater and Flood Management Section, first paragraph	Suggest spelling out cubic feet per second (cfs). Add "storm" to "100-year event". State "acres" after "residential, 306".	Have left cfs - used several time in this chapter and others. Have made other edits.	Yes
171	Stephanie Bauer, Port of San Diego	7/31/13	5-68	Section 5.8, Stormwater and Flood Management Section, first and second paragraph	References to the drainages is awkward and assumes reader knows where these are at. Need to include references on map figure. Should edit to state that there are three creeks in Pueblo: Chollas Creek, Paleta, and Switzer Creeks. Naming system should be consistent with other existing programs. Also, confirm the number of square miles.	Have modified and checked the drainages.	Yes
172	Stephanie Bauer, Port of San Diego	7/31/13	5-69	Section 5.8, Stormwater and Flood Management Section, first paragraph; second and third sentences	The peak discharge information is found in all watersheds discussed in plan. Concerned the average reader may not understand the relevance of this information. How does this information relate to water quality (stormwater and water supply) or flood control and help in making management decisions?	There is information about flooding and stormwater flows in Chapter 3 to provide background to the reader.	No
173	Stephanie Bauer, Port of San Diego	7/31/13	5-69	Section 5.8, Stormwater and Flood Management Section, second paragraph	Remove "Stormwater and " from the first sentence of the paragraph discussing flood management. The paragraph should focus on Flood Management only. Also, need to rewrite second sentence to reflect that "These jurisdictions are responsible for a large portion of flood control and drainage facilities..... " What other agencies are responsible for flood management?	This section is discussing both flood management and stormwater management. Changes not made. Other jurisdictions have been mentioned.	No
174	Stephanie Bauer, Port of San Diego	7/31/13	5-69	Section 5.8, Stormwater and Flood Management Section, third paragraph	This paragraph should be the first paragraph in the "water quality" section.	Has been covered by changes to water quality section.	No
175	Stephanie Bauer, Port of San Diego	7/31/13	5-69	Section 5.8, Stormwater and Flood Management Section, fourth paragraph	The information in this paragraph as the information is not correct. The Port and others did not "assist" the County but every municipal agency in San Diego Region had to develop and implement their own jurisdictional programs per MS4 permit requirements. Caltrans and Navy also have their own permits regulating stormwater. This is where additional discussion of the Municipal MS4 permit and other regulatory permits, such as industrial permits (general and individual) should be discussed. Also, the jurisdictions involved in Pueblo include the Cities of San Diego, La Mesa, and Lemon Grove, the Airport Authority, and Port of San Diego.	Have added additional jurisdictions into this section	Yes
176	Stephanie Bauer, Port of San Diego	7/31/13	5-69	Section 5.8, Stormwater and Flood Management Section, fourth paragraph	Delete last sentence about the Port of San Diego, as the Port does not have two separate programs, as was discussed in prior comment.	Yes, have made this revision	Yes
177	Stephanie Bauer, Port of San Diego	7/31/13	5-69	Section 5.8, Natural Resources Section	Reorganize paragraphs. Discuss Pueblo specific issues then general San Diego Bay issues. Use the format that was used in the Sweetwater and Otay watersheds write up for the Natural Resources section.	Yes, have made this revision	Yes

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178	Stephanie Bauer, Port of San Diego	7/31/13	5-69	Section 5.8, Natural Resources Section; third paragraph	Delete "also" from first sentence.	Yes, have made this revision	Yes
179	Stephanie Bauer, Port of San Diego	7/31/13	5-69	Section 5.8, Natural Resources Section; third paragraph	This section should look similar to section for Sweetwater. Need to better describe what the natural resources in this specific watershed are (which may help with identifying what particular projects in the future) as this section is too focused on San Diego Bay itself. Move the last paragraph to the beginning and include information about endangered species and issues with non-native (or invasive) species specific to this watershed(i.e., why are they a concern in this watershed).	Have rearranged the paragraph, but did not include additional information	No
180	Stephanie Bauer, Port of San Diego	7/31/13	5-70	Section 5.8, Climate Change Section, second paragraph	Remove "The Pueblo Watershed has a widespread beach community and", and edit sentence to say "Sea level rise has the potential to damage coastal infrastructure, minimize existing intertidal habitat, and negatively impact tourism and recreation in the Pueblo Watershed."	Yes, have made this revision	Yes
181	Stephanie Bauer, Port of San Diego	7/31/13	5-70	Section 5.8, Climate Change Section, second paragraph	Suggest removing "only" from last sentence	Yes, have made this revision	Yes
182	Stephanie Bauer, Port of San Diego	7/31/13	5-70	Section 5.8, Management Issues and Conflicts Section	This section doesn't effectively discuss management issues for Pueblo specifically and request for this section to be revised. While it does discuss coordination issues in second paragraph, it also does not discuss management issues relating to water supply and how management decisions should take an integrated approach to address as many issues as possible.	This information comes from the documents that we have. No specific edits were provided or source documents for additional issues were provided.	No
183	Stephanie Bauer, Port of San Diego	7/31/13	5-70	Section 5.8, Management Issues and Conflicts Section, first paragraph	Delete last three sentences. The section should discuss the existence of multiple regulations (such as TMDLs, MS4 permit, industrial permits, etc.) and what kind of issues may arise as result.	This information comes from the documents that we have. No specific edits were provided or source documents for additional issues were provided.	No
184	Stephanie Bauer, Port of San Diego	7/31/13	5-70	Section 5.8, Management Issues and Conflicts Section, first paragraph	Would suggest to provide background information on TMDLs in "Stormwater and Flood Management" Section to educate those not knowledgeable on TMDLs	This information comes from the documents that we have. No specific edits were provided or source documents for additional issues were provided.	No
185	Stephanie Bauer, Port of San Diego	7/31/13	5-70	Section 5.8, Management Issues and Conflicts Section, second paragraph	Delete this paragraph and replace with paragraph focused on resource limitations such as funding to implement various programs/plans to address stormwater -related permits and TMDLs. Part of this paragraph could then discuss costs to remediate areas in San Diego Bay, like the section of San Diego Bay shoreline, and how there are currently 21 sites identified to need remediation.	This information comes from the documents that we have. No specific edits were provided or source documents for additional issues were provided.	No
186	Stephanie Bauer, Port of San Diego	7/31/13	5-72	Section 5.8, References Section	Remove the first two Port references ("Total Maximum Daily Loads" and Stormwater Management") as these pages are no longer on the Port's website. Recommend to use the a more regional website like the Project Clean Water website or Regional Board website as a source, not an individual jurisdiction's website.	These are the sources that were originally referenced (see access date). Have left.	No.

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187	Stephanie Bauer, Port of San Diego	7/31/13	5-73	Section 5.9, first sentence	Add the following language (The Sweetwater watershed is contained within the San Diego Bay WMA, south of the Pueblo Watershed and north of the Otay Watershed, and covers..."	We have not included similar geographic references in other parts of this chapter - did not make the edit.	No
188	Stephanie Bauer, Port of San Diego	7/31/13	5-74	Section 5.9, Figure	Include jurisdictional boundaries and US Navy property on map. If the resolution is too wide to include this, perhaps add the sub watershed outlines?	We do not have these layers, we have not included the Navy on the map nor the sub watershed outlines for consistency with the rest of the maps.	No
189	Stephanie Bauer, Port of San Diego	7/31/13	5-75	Section 5.9, Hydrology, second paragraph	Change second sentence: "...drains into San Diego Bay, along with the Pueblo and Otay Watersheds." Third sentence is okay. Final sentence should end "...is the Sweetwater River which traverses the watershed and enters the bay between the Cities of National City and Chula Vista."	Yes, have made this revision	Yes
190	Stephanie Bauer, Port of San Diego	7/31/13	5-76	Section 5.9, Internal Boundaries and Land Uses, second paragraph	Delete "The relatively few jurisdictions provide the watershed opportunities to form close partnerships".	Yes, have made this revision	Yes
191	Stephanie Bauer, Port of San Diego	7/31/13	5-76	Section 5.9, Water Quality Section	As with Pueblo, this section needs work. Some suggestions follow but it may need additional editing. Doesn't really say anything about the current status of the overall health or quality of the watershed.	We have revised the water quality section to address comments. Please see revised.	Yes
192	Stephanie Bauer, Port of San Diego	7/31/13	5-76	Section 5.9, Water Quality Section	Move second paragraph to beginning of water quality section. Then, start first paragraph similar to suggestion for Pueblo: "The Sweetwater Watershed is highly impacted by pollutants carried by urban and agricultural runoff. Such pollutants include bacteria and pesticides. All water bodies in the Sweetwater Watershed are mainly impacted by agriculture and urban runoff which affects both surface and ground water quality; primarily DO, copper, bacteria, aluminum, manganese, and pH."	No, have left as is for consistency.	No
193	Stephanie Bauer, Port of San Diego	7/31/13	5-76	Section 5.9, Stormwater and Flood Control Section	As noted for Pueblo, talk about stormwater first then Flood management (per the heading of the sub-section)	Have not incorporated this edit - section is about both stormwater and flood, not necessarily one then the other.	No
194	Stephanie Bauer, Port of San Diego	7/31/13	5-76	Section 5.9, Stormwater and Flood Control Section	As noted for Pueblo, references to the drainages is awkward and assumes reader knows where these are at. Need to include references on map figure. Should edit to state that there are three creeks in Pueblo: Chollas Creek, Paleta Creek, and Switzer Creeks. Naming system for the creeks should be consistent with other existing programs. Also, confirm the number of square miles.	The creeks are referenced back in the Region Description (Chapter 3). Have confirmed the square miles.	No
195	Stephanie Bauer, Port of San Diego	7/31/13	5-76	Section 5.9, Stormwater and Flood Control Section	As discussed with Pueblo, need to add discussion of the Municipal MS4 permit (and associated established Jurisdictional programs to address stormwater) and other regulatory permits, such as industrial permits (general and individual) that also regulate stormwater, as currently it does not discuss this adequately. Also, add which jurisdictions are included in this watershed as well as state/federal agencies. Caltrans and Navy also had their own permits regulating stormwater.	Have added information about the MS4 and South Bay WURMP.	Yes

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196	Stephanie Bauer, Port of San Diego	7/31/13	5-78	Section 5.9, Management Issues and Conflicts	The section does not discuss management issues relating to stormwater regulations, or water supply and how management decisions should take an integrated approach to address as many issues as possible. The section should also discuss resource limitations such as funding to implement various programs/plans to address stormwater -related permits and TMDLs. (It should be noted that there are no adopted TMDLs in this watershed).	Have added information about no adopted TMDLs in the watershed	Yes
197	Stephanie Bauer, Port of San Diego	7/31/13	Figures	Section 5.10 Figure	Include jurisdictional boundaries on map. If the resolution is too wide to include this, perhaps add the sub watershed outlines?	We have not included the sub watershed outlines for consistency across the sections.	No.
198	Stephanie Bauer, Port of San Diego	7/31/13	5-83	Section 5.10, Hydrology Section, second paragraph	Remove first sentence (its repetitive to the last sentence of the first paragraph)	Have modified.	Yes
199	Stephanie Bauer, Port of San Diego	7/31/13	5-84	Section 5.10, Water Quality	Move second paragraph to beginning of water quality section.	Have not made this edit for consistency	No
200	Stephanie Bauer, Port of San Diego	7/31/13	5-85	Section 5.10, Stormwater and Flood Control	As discussed with Pueblo, need to add discussion of the Municipal MS4 permit (and associated established Jurisdictional programs to address stormwater) and regulatory permits, such as industrial permits (general and individual) that also regulate stormwater, as currently it does not discuss this adequately. Also, add which jurisdictions are included in this watershed as well as state/federal agencies. Caltrans also have their own stormwater permits.	Ok, we have included this information on the MS4	Yes
201	Stephanie Bauer, Port of San Diego	7/31/13	5-85	Section 5.10, Stormwater and Flood Control, second paragraph	This section is heavily focused on flood control. When it does mention stormwater management, it sounds like the County controls it all. Not so, as there are other jurisdictions (Chula Vista, County, Coronado, Imperial Beach, City of San Diego, and Port) as well as state agencies (Caltrans) that are in the developed regions of the watershed.	Have added the other (non-County) jurisdictions.	Yes
202	Stephanie Bauer, Port of San Diego	7/31/13	5-85	Section 5.10, Stormwater and Flood Control, first paragraph	Suggest ordering the land use acreage in order of size rather than alphabetical.	Have left as is for consistency across watersheds	No
203	Stephanie Bauer, Port of San Diego	7/31/13	5-85	Section 5.10, Natural Resources, second paragraph	Correct spelling of "watershed" in fourth line from bottom of paragraph.	Yes, have made this revision	Yes
204	Stephanie Bauer, Port of San Diego	7/31/13	5-85	Section 5.10, Natural Resources, last paragraph	Suggest changing wording of first sentence, as the Bay isn't technically within the watershed, it is at the end of it.	Yes, have made this revision	Yes
205	Stephanie Bauer, Port of San Diego	7/31/13	5-87	Section 5.10, Management Issues and Conflicts	The section does not discuss management issues relating to stormwater regulations, or water supply and how management decisions should take an integrated approach to address as many issues as possible. The section should also discuss resource limitations such as funding to implement various programs/plans to address stormwater -related permits and TMDLs. (It should be noted that there are no adopted TMDLs in this watershed).	Yes, have made this revision	Yes

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206	Stephanie Bauer, Port of San Diego	7/31/13	5-87	Section 5.10, Management Issues and Conflicts	Add an "s" to the second "increase" of the sentence.	Yes, have made this revision	Yes
207	Stephanie Bauer, Port of San Diego	7/31/13	7-35	Section 7.8.1, Relation to Climate Change Planning	The San Diego Foundation's Climate Initiative "recommended" not required every jurisdiction in County to complete a GHG emissions inventory.	Yes, have made this revision	Yes
208	Stephanie Bauer, Port of San Diego	7/31/13	7-35	Section 7.8.1, Relation to Climate Change Planning	Misspelling - replace "compete" with "complete"	Yes, have made this revision	Yes
209	Stephanie Bauer, Port of San Diego	7/31/13	8-14	Section 8.4.16, Pollution Prevention	First paragraph is awkward and doesn't really connect with the next sentence.	We have edited to make more sense and increase connectivity.	Yes
210	Stephanie Bauer, Port of San Diego	7/31/13	8-14	Section 8.4.16, Pollution Prevention	Not only MS4 copermittees doing this but other state and federal agencies as well (Caltrans/Navy).	Yes, have made this revision	Yes
211	Stephanie Bauer, Port of San Diego	7/31/13	8-14	Section 8.4.16, Pollution Prevention	Add "inspections of municipal, industrial, and commercial facilities for compliance with stormwater ordinances" Also add "Implementing education programs for the general public, school children, and target audiences"	Yes, have made this revision	Yes
212	Stephanie Bauer, Port of San Diego	7/31/13	8-14	Section 8.4.16, Pollution Prevention	Why mention TMDLs here and not in "Urban Runoff Management"? Need to be clear on purpose of adding TMDL info here. Also, not entirely clear on how the two sections ("Pollution Prevention" and Urban Runoff Management") are different as the sections are currently written.	Have modified	Yes
213	Stephanie Bauer, Port of San Diego	7/31/13	8-15	Section 8.4.18, Urban Runoff Management	Urban Runoff Management is more than what is currently listed. Currently it sounds that the two bullets are the only things the copermittees are doing. This can be bulked up. Start second sentence with "Examples of current ongoing urban runoff management strategies include: ..." Delete "implemented by the MS4 copermittees within the region have been directed toward the following" as it doesn't seem necessary and it should be acknowledged that other entities also are involved in urban runoff management.	Yes, have made this revision	Yes
214	Stephanie Bauer, Port of San Diego	7/31/13	8-15	Section 8.4.18, Urban Runoff Management, first paragraph	Not only MS4 copermittees doing this but other state and federal agencies as well (Caltrans/Navy).	Yes, have made this revision	Yes
215	Stephanie Bauer, Port of San Diego	7/31/13	8-15	Section 8.4.18, Urban Runoff Management, first bullet	Need to change to "Regulatory requirements to implement strategies such as BMPs and public education to limit runoff flows".	Yes, have made this revision	Yes
216	Arne Sandvik, Padre Dam	8/5/13	5-58	Section 5.7, San Diego Watershed, Water Quality, top paragraph	Text states that Mission Bay Landfill could be leaking into local waterways, especially those within the service area of Lakeside Water District. The Mission Bay Landfill is located between Seaworld and Interstate 5 near Fiesta Island. Lakeside Water District is located miles upstream; not possible to be affected. Verify/revise.	Yes, we have made this revision. See response to comment #112.	Yes

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217	Arne Sandvik, Padre Dam	8/5/13	5-58	Section 5.7, San Diego Watershed, Water Quality, fourth paragraph, first sentence	Revise text as follows: <u>Portions of t</u> The Santee-EI Monte Basin <u>are</u> is -contaminated with nitrates, TDS and methyl tertiary butyl ether (MTBE). Lakeside Water District at one time provided treatment for removal of MTBE and blending for nitrate compliance in the groundwater supply, but has not used this supply since 2007 (Lakeside Water District, 2011).	Yes, have made this revision	Yes
218	Linda Flournoy	8/5/13	N/A	N/A	Mostly VERY understandable, and when language gets technical (term=paragraph stuff), if it is sometimes a little unwieldy, it is accurate and concise and useful, if one pays good attention. Some cross-referencing could be cleaned up/added, and if <u>sub</u> -section titles (e.g., "1.2 Plan Overview) were also above the date at top it might be easier to navigate. Mostly I noticed that, while TOC makes sense/flows, as I was reading (and interrupted frequently, as others will be), many Sub-Sections jump quite suddenly into the next and I had feelings of confusion... Each Sub-Section, though, tends to read very well through itself, so some form of continuity may be all that is needed, or perhaps a "walk-through" at the end of the Intro, to prep the reader. So, I wanted you to know how pleased I was, before I started getting into the meat of my edits and comments, as I hope they will be well received. Yay, Team!	Yes, we added additional cross-references and numbered headings to allow the reader to more easily navigate the document.	Yes
219	Linda Flournoy	8/5/13	1-1	Chapter 1, Section 1.1, Bullet 1 Sentence 1	I would like a descriptive adjective/phrase before "...variety...": Sentence is blasé compared to reality. Probably too soon to say "...31 distinct habitat types, more than [I heard] anywhere else in the world within a comparable area..." [no internet at moment, so can't check, but...]. So, perhaps something in this first, and formative, bullet that expresses the amazing specialness of this Region. Though a technical document, I still think we would like to grab them with amazing truths.	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
220	Linda Flournoy	8/5/13	1-2	1.1 IRWM Planning, top of the page	add, "projects that improve water resources <i>integration and</i> management".	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
221	Linda Flournoy	8/5/13	1-3	Benefits of Regional Approach, last sentence	Double preposition - delete "in"	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
222	Linda Flournoy	8/5/13	1-3	Existing Planning Environment, before the second paragraph.	Needs lead-in sentence such as: " <u>In the San Diego Region, a number of different entities are currently responsible for seemingly separate areas of water management.</u> "	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
223	Linda Flournoy	8/5/13	1-3	Existing Planning Environment, paragraphs 2-5	For easier readability, perhaps underline (or Bold? or?) each entity: <u>Water Authority</u> , <u>Regional Water Quality Control Board</u> , <u>DWR</u> , <u>21</u> <u>stormwater management entities</u>	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
224	Linda Flournoy	8/5/13	1-3 and 1-4	Existing Planning Environment, middle of second paragraph	add, "... summary of <u>water use</u> , wastewater volumes..."	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No

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225	Linda Flournoy	8/5/13	1-4	Existing Planning Environment, Last paragraph, Last Sentence	add, "...to address long term priorities and to incorporate..."	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
226	Linda Flournoy	8/5/13	1-6	First paragraph	Add First Line: "...(RWMG)..." for first use. Add?: Is it appropriate to say: "... (in no particular order): ...", or is there an order?	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
227	Linda Flournoy	8/5/13	1-8	First paragraph	"... all but one of the Region's watersheds (San Juan)."	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
228	Linda Flournoy	8/5/13	1-8	Water Authority, second paragraph, last sentence	Add link address to CWA Board Members webpage?	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
229	Linda Flournoy	8/5/13	1-10	County, end of the fifth paragraph	"Following transition...lead permittee...Watersheds, and a member in the others. " Is this correct?	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
230	Linda Flournoy	8/5/13	1-11	First paragraph, second and third sentences	"...with respect to increasing stakeholder diversity and input , changing conditions..." "...timeline and outline of major..."	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
231	Linda Flournoy	8/5/13	1-11	2006 bullet	"...(RAC), a collection of diverse professionals who represent diverse groups and points of view with a stake..."	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
232	Linda Flournoy	8/5/13	1-11	sixth bullet	Add: " Sharing watersheds " somewhere...	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
233	Linda Flournoy	8/5/13	1-12	First sentence	Add: " stormwater and flood " somewhere...	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
234	Linda Flournoy	8/5/13	1-12	Third paragraph, second sentence	"... prove useful in identifying, coordinating and addressing environmental..."	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
235	Linda Flournoy	8/5/13	1-12	Fourth paragraph, first sentence	"...IRWM Plan may help make..."	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
236	Linda Flournoy	8/5/13	1-13	Table 1-2, Item 1, Right Column, First Sentence	"... the recommended action items..." Is this the first mention of this? Will they know what you mean?	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
237	Linda Flournoy	8/5/13	1-16	CEQA Exemption	Mention NEPA. Add at end: " Projects funded through IRWM must individually comply with CEQA and NEPA requirements. "	Chapter 1 has been cumulatively updated - language edits provided here no longer apply.	No
238	Linda Flournoy	8/5/13	2-3	Section 2.3, first paragraph, last sentence	"... triple-bottom line to foster..."	Yes, have made this revision	Yes
239	Linda Flournoy	8/5/13	2-5	First paragraph, last sentence	"... Objective B, and at least one additional..."	Yes, have made this revision	Yes
240	Linda Flournoy	8/5/13	2-5	Third paragraph, second sentence	"...integrated approaches to water resources and their management..." [The <i>water resources</i> need integrating, not just their management.]	Yes, have made this revision	Yes
241	Linda Flournoy	8/5/13	2-5	Third paragraph, third sentence	"...encourages planning and understanding of the inter-relationships across a variety..."	Yes, have made this revision	Yes
242	Linda Flournoy	8/5/13	2-5	Fourth paragraph, third sentence	"... economically preferable, in the long-term as well. "	Yes, have made this revision	Yes

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243	Linda Flournoy	8/5/13	2-6	First paragraph, last sentence	"... Objective B, and at least one additional..."	Yes, have made this revision	Yes
244	Linda Flournoy	8/5/13	2-7	After last bullet	Add as Bullet or Sentence?: "Identifying gaps in existing data and/or research needs to improve water resource management"	Yes, have made this revision	Yes
245	Linda Flournoy	8/5/13	2-7	Last bullet	"... ensure... consistent with public interests, and provide for ... activities and bring diverse viewpoints to improve the next Plan Update."	Yes, have made this revision	Yes
246	Linda Flournoy	8/5/13	2-8	Fourth paragraph, second sentence	Delete: "ether" and "...improve water quality long term."	Yes, have made this revision	Yes