

Comment Number	Comment Summary	Acknowledgement/Response
COMMENT LETTER A, SAN DIEGO COASTKEEPER, July 28, 2015		
A1	little, if any, additional actions and strategies will necessarily result	<p>The Water Quality Improvement Plan (Plan) is a living document, and programs will continually be adapted based on new and applicable data. Examples of new and improved strategies include: focused programs based on need; new residential inspection programs; social marketing programs that target specific behaviors; enhanced data tracking methods; incentive programs for residential rain harvesting; focus on effective prohibitions; and development of optional strategies that may be triggered if goals and targets are not being met.</p> <p>Section 3.2 of the Plan discusses strategies; Sections 3.2.3 and 3.2.4 provide load reduction quantifications for wet and dry weather anticipated to occur from Plan implementation; and Section 3.2.6 explains how the goals would be achieved through Plan implementation, with examples from each agency's suite of strategies (Appendix 3B).</p>
A2	substantive revisions to the plans based on CP feedback often failed to take place, and where they did they were minor in scope; copermittees did not adequately consider all relevant data in making their priority water quality condition determinations	<p>All comments received from the Consultation Panel have been carefully reviewed. Many revisions were made to Chapters 2 and 3 (in response to Consultation Panel and other public input received during the development process.</p> <p>Since the Plan was submitted in June 2015, additional comments were received from the public and Regional Board staff. In response, significant revisions were made including: goals are adequately linked to water quality improvements, are measurable, and include interim goals that directly measure progress (Section 3.1); strategies more clearly demonstrate the linkage to relevant sources, pollutants, and water quality improvements (Section 3.2); quantification of anticipated load reductions for nutrients associated with proposed strategies (Tables 3-25, 3-26 and 3-27); and, optional strategies include implementation timeframes, triggers and resources required for implementation, as applicable (Tables 3-22 and 3-23).</p>
A3	trash is an obvious & significant issue in the SDR	<p>Trash was raised as a concern by several stakeholders, including the San Diego River Park Foundation (SDRPF). Reports prepared by the SDRPF were reviewed and trash was reconsidered using the prioritization process. Although the reports illustrate that there are places in the watershed where trash is evident, they are also clearly indicate that the source of trash is most often not related to the storm drain system.</p> <p>While trash did not get elevated to a PWQC, several updates were made to the Plan. A discussion of existing and proposed trash clean-up efforts was added to Chapter 2, with data from the SDRPF on trash clean-up efforts referenced. Dry weather constituents related to trash were used in the prioritization process (which was already included in wet weather), and, a discussion of sources of trash was added. Appendix 2D of the WQIP, was revised to include trash in the prioritization process. Several strategies specifically addressing trash</p>

		are already included in the Plan. In addition, the City of San Diego added strategy CSD-46 to Table 3B-1 of Appendix 3B summarizing a planned trash cleanup project in the San Diego River. Jurisdictional strategies tables in Appendix 3B were also updated to better identify the strategies that would reduce trash.
A4	TMDL-focused priorities were overwhelmingly chosen across the WQIPs; it is unclear whether selection of priority conditions & methodologies were based on legitimate data & public input	As required by Provision B.2 of the Permit, many factors were considered during development of the methodology for PWQC selection and elevation to High Priority Water Quality Condition (HPWQC). These factors include an in-depth assessment of receiving water conditions and the potential impacts that storm drain systems have on receiving water quality. Based on data compiled over the past two permit cycles and information received from a public call for data, PWQCs, and the HPWQC were selected. The methodology used is consistent with the requirements of the Permit, and is a result of input from Participating Agency staff, industry experts, the Consultation Panel, the public, and Regional Board staff ("Stakeholders").
A5	numeric goals fail to show how the goals will result in achievement of WQ standards; goals, strategies and schedules are unsupported by data or do not meet the requirements of the Permit	Goals have been developed to address Bacteria, the HPWQC. The interim and final goals have been updated to explicitly address the requirements of Provision B.3.a.(1)(a) and (b) of the Permit (Section 3.1), and the final goals are now clearly linked to one or more compliance pathways as allowed under the Bacteria TMDL (see Permit Attachment E.6.b.(3)(a-f)). These compliance pathways are directly supportive of Provision B.3.a.(1)(a)(i-iii). The schedules for achieving final goals are based on the TMDL compliance schedules contained in Attachment E of the Permit. Strategies were developed to support attainment of the goals within the specified time periods. The effectiveness of BMPs is presented as anticipated load reductions (Chapter 3) using quantitative modeling approaches. Strategies have been updated to indicate the linkage between the sources and pollutant(s). A suite of strategies for implementation were selected to target the HPWQC and achieve the interim and final goals. If it is determined that progress towards goals is not sufficient, the strategies will be modified, and/or new strategies will be employed. The optional strategies are described in detail in Chapter 3, and include timeframes, triggers, and resources necessary for implementation of each optional strategy.
A6	N/A; comment on Carlsbad WQIP	N/A
A7	WQIPs fail to show how goals are based on reliable "measurable criteria" or "indicators capable of demonstrating" compliance with the permit	See comment A5. In addition, interim goals have also been updated to ensure that at least one interim goal for each final goal is expressed as a reasonable increment toward achievement of the final goal. The goals also include a description of the metric that will be used to measure progress as well as the baseline condition.

A8	(footnote) N/A; comment on Tijuana WQIP	N/A
A9	Strategies are similar to previous activities; no details on how these strategies would result in achievement of B.3.a.(1)(a) requirements.	<p>See comment A1 regarding how the Plan and current JRMP strategies differ from those described in previous iterations of the JRMPs.</p> <p>The goals (Chapter 3) have been revised to demonstrate a clear linkage to the requirements in Provision B.3.a.(1)(a). As the goals are based on the TMDL compliance pathways, their attainment will demonstrate that storm drain discharges are not causing or contributing to exceedances of receiving water limitations, and/or that conditions in receiving waters are protected from storm drain discharges, and/or that beneficial uses are protected from storm drain discharges.</p>
A10	N/A; comment on Tijuana WQIP	N/A
A11	N/A; comment on Carlsbad WQIP	N/A
A12	N/A; comment on Los Penesquitos WQIP	N/A
A13	N/A; comment on SDB WQIP	N/A
A14	WQIP strategies mimic previous JRMP strategies that have proven to be ineffective at protecting receiving waters and beneficial uses; WQIPs must include more specific data to show how the strategies are linked to the required outcomes	<p>See comment A1.</p> <p>Reductions in beach postings are indicative of improvements in water quality and can be partly attributed to implementation of stormwater programs. Under the Plan, continued program improvements and new strategies are included to increase water quality benefits. Where possible, these benefits are quantified within the WQIPs and will be measured through progress made toward attaining goals. It is anticipated that the strategies will continue to focus on improvements under dry weather conditions, but will also better address pollutants during wet weather, resulting in improvements year round.</p>
A15	Structural BMPs, incentives and retrofitting, stream, channel and/or habitat rehabilitation projects must be included as potential strategies (ref. Permit Provision B.2.e).	The Plan includes a list of every potential strategy identified during development process (Appendix 3A). The Participating Agencies have revisited their optional strategies, at both the jurisdictional and watershed scales, presented in Tables 3-22 and 3-23. Strategies are grouped to demonstrate compliance with each item required under Provision B.3.b.(1)(b) and (c).
A16	Both jurisdictional and watershed optional strategies are required, and triggers and schedules must be included for each	The Plan has been revised to clarify which optional strategies would be implemented. Also, optional strategies have been revised to include information that describes the implementation timeframes, triggers, and resources necessary to implement each.

A17	Copermittees must include all the potential water quality improvement strategies identified by the public with the Provision B.2 submittal to the Regional Water Board	All potential water quality improvement strategies identified by stakeholders were included in the Plan (see Appendix 3A) and considered when developing the strategies included in Appendix 3B. Many of the suggested strategies are included in the optional strategies within the Plan.
A18	Optional strategies must include the circumstances necessary to trigger implementation.	Optional strategies have been revised and updated to now include information that describes the implementation timeframes, triggers, and resources necessary, at both the jurisdictional and watershed levels. Optional jurisdictional strategies are presented in Table 3-22 and optional watershed strategies are presented in Table 3-23.
A19	Schedules for achieving goals must be as soon as possible.	Schedules developed for the goals reflect the earliest possible time that goals are likely to be achieved. The revised goals are based on the Bacteria TMDL timelines as allowed in Attachment 6.E of the Permit. Due to the comprehensive, multi-benefit nature of the plans, the 10 and 20 year compliance timelines for dry and wet weather are warranted. The adaptive management process will be used to measure progress towards attainment of the goals, strategies will be adjusted and the goals themselves may be revisited.
A20	N/A; comment on Carlsbad WQIP	N/A
A21	The WMAA region-wide analysis was not updated with watershed-specific data; we believe our comments on the region-wide analysis are still relevant - attached.	Please refer to previous response to comments applicable to region wide WMAA.
COMMENT LETTER B, TORRENT RESOURCES, JULY 29, 2015		
B1	Infiltration is identified as a pollutant control strategy in the WQIPs, but it often infeasible due to soils in the region; a dry well can often be drilled through well-drained subsurface materials, making infiltration feasible for projects possible.	Comment noted.
COMMENT LETTER C, SURFRIDER FOUNDATION – SAN DIEGO COUNTY CHAPTER, JULY 30, 2015		
C1	The WQIPs lack commitment and detail and appear to be more of the same or "business as usual" by the copermittees.	See Comment A1

C2	The WQIPs fail to list numeric goals and strategies that address the highest priority pollutants and fail to demonstrate the link between strategies and water quality outcomes.	See comment A5. The effectiveness of non-structural and structural BMPs are estimated and presented as anticipated load reductions (Chapter 3). Text has been added to the discussion of strategies to indicate the linkage between the sources and pollutant(s) they will address. The suite of strategies are designed to target Bacteria and achieve the interim and final goals. Should progress towards goals be insufficient, the strategies will be modified, and/or new strategies will be employed through the adaptive management process. Optional strategies are described in Chapter 3, and include the timeframes, triggers, and resources necessary for each optional strategy. Jurisdictional strategies (see Tables 3-18 through 3-21), as well as optional strategies tables referenced in Response to Comment A-15 and A-18, and Appendix 3B) include the linkage between the strategies, sources addressed, and pollutants addressed by each.
C3 – C14	N/A; comments on Los Penasquitos WQIP	N/A
C15	The WQIPs fail to meet the intent and requirements of the Permit.	Comment noted.
COMMENT LETTER D, TORY R. WALKER ENGINEERING, JULY 30, 2015		
D1	The commenter seeks to provide a complimentary alternative approach to exemption criteria in the Regional Watershed Management Area Analysis.	Comment noted.
COMMENT LETTER E, SAN DIEGO REGIONAL WATER QUALITY CONTROL BOARD, AUGUST 5, 2015		
E1	All known pollutants and conditions of concern previously identified must be included as required by Provisions B.2.a through c; if bacteria is the HPWQC in a Bacteria TMDL watershed, WQIP should include load reductions for other pollutants.	As required by Provisions B.2.a-c, all known pollutants and conditions of concern were considered in the identification of priority water quality conditions (Appendix 2D). Bacteria was identified as the HPWQC. Multi-benefit water quality improvement strategies were developed to address bacteria and other pollutants. This multi-benefit approach fosters the most efficient use of public funds and is more effective in improving water quality. In order to demonstrate the effectiveness of the strategies to address other pollutants, estimated load reductions for nutrients (total nitrogen and total phosphorus) have been estimated for non-structural and structural strategies based on updated modeling. See Tables 3-25, 3-26, 3-27, 3-30, 3-31, 3-32, and associated appendices.

E2	Final Numeric Goals must be numeric, measurable, and capable of demonstrating the Copermittees' storm drain discharges will not cause or contribute to exceedances of receiving water limitations, or the receiving waters are protected from storm drain discharges, or both (Provision B.3.a.(1)(a)); Final Numeric Goals should comply with prohibitions and limitations of Provision A, have clear metrics, demonstrate that their achievement will result in storm drain discharges that do not cause or contribute to exceedances of WQ standards in receiving waters and/or the receiving waters are protected from storm drain discharges, and clearly link to addressing the HPWQC.	See comment A5.
E3	Interim Numeric Goals must be expressed in the same metric as the associated Final Numeric Goal, and there should be an Interim Numeric Goal for each Final Numeric Goal.	See comments A5 and A7.
E4	Potential Water Quality Improvement Strategies that were considered for implementation must be included in the WQIP	All potential water quality improvement strategies identified by stakeholders are listed in the Plan (Appendix 3A) and were considered during development of the WQIP strategies discussed in Chapter 3 and listed in Appendix 3B. Many of the suggestions are included in the optional strategies.

E5	Optional Jurisdictional Strategies must comply with the requirements of Provision B.3.b.(1)(b); Optional Jurisdictional Strategies should have implementation-oriented phrasing and should not be activities that are already otherwise required by the permit (i.e., Provision E.2 through E.7 activities).	The optional jurisdictional strategies have been revised and updated (Table 3-22), and are grouped to address the requirements under Provision B.3.b.(1)(b); the complete suite of optional jurisdictional strategies are included in Appendix 3B. Additionally, the optional jurisdictional strategies now include descriptions of the implementation timeframes, triggers, and resources necessary to implement them.
E6	Optional Watershed Management Area Strategies must comply with Provision B.3.b.(2)(a) through (c).	The optional watershed strategies (Table 3-23), were updated to ensure that they meet the requirements of Provision B.3.b.(2) of the Permit. The optional watershed strategies now include BMPs, incentives, retrofit programs, and stream restoration/rehabilitation oriented strategies and contain additional information describing the implementation timeframes, triggers, and resources necessary to implement each optional strategy.
E7	For Bacteria TMDL watersheds, the schedule for achieving numeric goals can only be 10 years for dry and 20 years for wet if other pollutants, in addition to bacteria, have quantified load reductions.	See comment E1 and Tables 3-25, 3-26, 3-27, 3-30, 3-31, 3-32, and associated appendices.
E8	Schedules for implementing strategies must comply with Provision B.3.b.(3).	The strategy tables in Appendix 3B and the optional strategies tables within the Plan (see Tables 3-22 and 3-23) were revised to clearly articulate the timeframe and schedules for implementation. Optional strategies also include realistic assessments of the shortest practicable time required to secure resources and initiate implementation. Jurisdictional strategies also include a frequency column to indicate whether the strategy will be completed within a schedule, implemented periodically, or continuously.
E9	WMAA - for future hydromodification management BMP exemptions to be acceptable, an erosion potential analysis that uses continuous simulation modeling to show that a channel will not erode in the range of geomorphically significant flows for the fully built out condition of the drainage area at the most sensitive channel	The Plan has been updated to include a detailed methodology for determining Hydromodification Management Exemptions, see new Appendix 3I. The methodology includes the use of continuous simulation modeling to show that a channel will not erode in the range of geomorphically significant flows for the fully built out condition of the drainage area at the most sensitive channel segment.

	segment(s) included in the WMAA should be conducted.	
E10	N/A; comment on Carlsbad WQIP	N/A
E11	Proposed hydromodification management BMP exemptions are authorized to be applied to any Priority Development Projects within any jurisdiction until the WQIP, JRMP and BMP Design Manual for that jurisdiction are accepted by RWQCB.	Comment noted.
COMMENT LETTER F. SAN DIEGO AUDUBON SOCIETY, JULY 23, 2015		
F1	Copermittees should be required to measure the levels of the priority water quality conditions over time, establish target improvements, and require adaptive management of the water quality infrastructure and practices also improve measureable and accountable improvements for each of the PWCQ.	The Monitoring and Assessment Plan includes monitoring for all PWQCs, in receiving waters and at storm drain outfalls, during both wet and dry weather. Data will be used during the assessment and adaptive management process to periodically refine priorities, goals, strategies, and timelines as set forth in the Permit (See Provisions A.4, B.5, and D.4).
F2	Copermittees should be required to include litter in the list of priority water quality conditions and include measures and performance thresholds for the discharge of litter into the San Diego River.	Please refer to acknowledgement/response to comment A-3.
F3	Copermittees should be required to implement quicker-to-implement non-structural strategies to reduce the pollutants of concern while they are developing long-term structural solutions.	The Plan prioritizes non-structural BMPs for implementation in the near term to demonstrate incremental progress towards meeting goals. As described in Section 3.2.2 of the WQIP and in Appendix 3A, jurisdictions will implement an array of strategies appropriate and effective to address the HPWQC and PWQCs. This includes stormwater conveyance system inspections and maintenance and creek enhancement/restoration efforts that are expected to make demonstrable progress towards meeting interim goals.